

APPENDIX K4

COUNTY

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COMMENT(S)

RESPONSE(S)

C1

Baker County, Oregon



Bill Harvey
Commission Chair
bharvey@bakercounty.org

Tim L. Kerns
Commissioner
tkerns@bakercounty.org

Mark Bennett
Commissioner
mbennett@bakercounty.org

March 18, 2015

RECEIVED

MAR 19 2015

BUREAU OF LAND MANAGEMENT
BAKER CITY, OREGON

Don Gonzales,
Manager, Vale District
US Department of Interior
Bureau of Land Management
100 Oregon Street
Vale, Oregon 97918
Submitted Electronically

Re: Boardman to Hemmingway Project DEIS comment

Dear Manager Gonzales:

Baker County appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Boardman to Hemmingway proposal. Baker County has participated in all facets of the sitting process from the inception (pre application 2007) of the project, including meeting with Idaho Power, the BLM, Oregon Department of Energy, and all of the various agencies both state and federal. Baker County's comments and concerns, as outlined in this letter, continue to remain substantially the same as they have throughout this application process; see the attached letter from January 29, 2009 to your predecessor, David Henderson, which is hereby incorporated as part of our comments. We attach the letter to demonstrate the substantial concerns Baker County has been discussing with the Bureau of Land Management and Idaho Power for over six years remain unsatisfactorily addressed, and Baker County expects they be given due consideration, attention and most importantly, resolution, prior to finalizing the Environmental Impact Statement or making any decision on the proposed project.

While some of the concerns identified in our comment are fairly universal to the project, this comment is specifically focused on the issues and impacts within the area of our jurisdiction. I believe you will find our jurisdiction shares concerns within the same 'theme' as other jurisdictions, and we ask all of these concerns be given appropriate consideration.

The DEIS insufficiently analyzes a reasonable range of alternatives

Baker County recognizes there are many challenges in developing an accurate Environmental Impact Statement for a linear facility that includes 305 miles of potential routes. Still, that is what is required by the National Environmental Policy Act (NEPA) and that end has been the goal of many years worth of study. In reviewing the document, Baker County is certain that the full range

Baker County Comment on Boardman to Hemmingway DEIS

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CEQ does not require that all reasonable alternatives have to be considered; rather, a reasonable range of alternatives should be considered. The EIS identified and analyzed a reasonable range of alternatives.

C1a

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

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Baker County, Oregon (cont.)

C1a

of alternatives that are required to be evaluated under NEPA have not been fully investigated, and the amount of analysis and data produced for the Environmentally Preferred Alternative unduly weights the process toward one conclusion. We find this slant to be a fatal flaw in the document, as producing less data Preferred results in inaccurately and incompletely disclosing the impact of all alternatives, impeding you as the Decision Maker from utilizing the balancing process intended by NEPA to do

C1b

One alternative that Baker County finds was given next to no consideration is the No Action Alternative. As you know, due consideration of this alternative is required under NEPA, and as you also know, a number of Baker County's citizens have expressed that the No Action Alternative is the only alternative that makes sense for this project. Furthermore, Baker County's early concern expressed by all effected Oregon counties about the convergence of the NEPA process and the State of Oregon Energy Facility Siting Council (EFSC) process for permitting the proposal never has been adequately addressed; just as the Oregon counties feared, the evaluation of the impacts of the proposed route on federally managed lands weights the process toward siting on private lands, and by not considering the environmental impact on private land, will produce impacts on the natural and human environment that may be greater than that of a proposal that is sited on more federally managed land (reference DEIS page 1-3 lines 31-32).

C1c

Furthermore, a greater range of viable alternatives should have been produced and considered for the Durkee area, an area of the proposed project that has been a long-standing concern for Baker County. The Burnt River Mountain alternative route fails to adequately balance or mitigate the impacts to the habitat, resources, economics, and dwellings of the area. The Durkee valley is surrounded by lands managed by the Bureau of Land Management proposed to cut a swath 250 feet wide through working agricultural lands, and the impact to the natural and human environment for those private lands is not considered fully, while resource concerns on federally managed land 'trumped' many of the alternatives the area residents tried to propose. The area residents discussed proposing an alternative route through an area off of the valley floor with BLM officials and were told the proposal couldn't be made because of Bighorn Sheep habitat constraints. It is our understanding that the concerns regarding Bighorn Sheep habitat no longer constrain the area, but the inappropriate weighting of one potential environmental impact over the un-analyzed impacts to private lands, coupled with the inaccurate recommendation from BLM officials that the route not be proposed because of a single resource concern, prevented the full-range of proposals from ever being proposed, discussed and analyzed. Much work is left to be done in this

Baker County Comment on Boardman to Hemmingway DEIS

C1b

The BLM believes the analysis of the No Action meets the CEQ guidelines.

This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.

C1c

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

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C1

Baker County, Oregon (cont.)

C1c

area if the range of alternatives that appropriately disclose and evaluate in a balanced way the impacts to the natural and human environment be analyzed. More discussion on the alternatives proposed for the Durkee area follows in this comment.

C1d

The DEIS does not document or substantiate the need for this project
In reviewing the page 1-1, lines 13-16, of the DEIS, the project goal of additional electrical load capacity between the Pacific Northwest and southwestern Idaho, plus alleviating existing transmission constraints and ensuring sufficient capacity to meet present and future demands, is worthy of additional consideration. The electrical load capacity and the constraints of the existing transmission system have changed significantly as the economic incentives for wind power development have dried up, and those changes should be thoroughly investigated; if the need has changed or no longer exists.

C1e

Power to be the entity responsible for improving electrical load capacity or to alleviate existing transmission constraints. The project goal certainly does not demonstrate how that goal translates for a need for this particular project following these particular proposed routes. If the need has been determined by the Oregon Public Utility Commission and Idaho Public Utility Commission, are there other projects that could meet that need that would have less impact on the natural resources?

C1f

We see no demonstration that either Commission has required Idaho Power to make this proposal. Baker County asks that the goal and need be revisited and critically evaluated, because the proposal asks the people of Baker County (both as owners of the public lands and as individual private landowners) to sacrifice valuable land.

The proposed transmission line does not provide a direct benefit to the citizens of Baker County, and as a result it is preposterous that the line be sited on 85% private land, when the line is for the benefit of power producers and consumers.

Bennett says, we equate this proposal to siting a freeway through Baker County with no on-ramps or off-ramps, when we are unconvinced the freeway is even needed. Baker County does not find in the document a reference to a determination from the Federal Energy Regulatory Commission that states Idaho Power needs to construct the proposed transmission line; if

evaluation of need to be severely deficient and the limited information about need that is including is unconvincing. Baker County acknowledges that the information may be in the DEIS and we've missed it. If there is not a need for the proposed project, or if the need is low, and the consequences to the natural and human environment of siting a transmission line through two

Baker County Comment on Boardman to Hemmingway DEIS

C1d

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized by the Public Utilities Commission. The responsibility of BLM and other land-management agencies is to respond to the application for right-of-way across lands it administers. The most readily available information was used during development of the Draft EIS.

The Applicant's 2015 Integrated Resource Plan (IRP), a long-term resource planning study, recently reaffirmed that the B2H Project is essential to serving future growth in customer demand. Previous IRPs also identified the need for this transmission line project, going back to the 2006 IRP. The 2015 IRP indicates the need of the B2H Project remains strong. When finished, the B2H Project would help provide low-cost energy to the Applicant's customers in southern Idaho and eastern Oregon. The B2H Project also will interconnect with existing transmission systems owned by B2H Project partners PacifiCorp and the Bonneville Power Administration, allowing greater amounts of electricity to move throughout the Pacific Northwest. This helps meet a regional need and provides benefits to the entire area, much of which is served, directly or indirectly, by those two providers. In addition, the B2H Project allows the Applicant to serve its growing load without building carbon-emitting resource.

The BLM believes the analysis of the No Action meets the CEQ guidelines.

C1e

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized and approved as appropriate by the Public Utilities Commission in each state. The Applicant's goals and objectives for a project are outlined in their IRP, which is updated every two years and can be found at <http://www.pacificcorp.com/es/irp.html>.

C1f

It is not BLM's role or responsibility to verify an applicant's interests and objectives for a proposed project. As a regulated utility, the need for transmission projects proposed by the Applicant is scrutinized by the Public Utilities Commission. The responsibility of BLM and other land-management agencies is to respond to the application for right-of-way across lands it administers. The most readily available information was used during development of the Draft EIS.

COMMENT(S)

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C1

Baker County, Oregon (cont.)

C1f

states and seven counties are high, we return again to the conclusion that the No Action Alternative was not considered adequately and given as equally robust a discussion in the DEIS as the Environmentally Preferred Alternative.

C1g

If, through a comprehensive and critical evaluation, you as the Deciding Officer can establish that there is a pressing need for this project, we turn our attention to the question of burden. If the need is for the national, or even regional, public good, then the public should bear more of the burden of accommodating that need by fairly siting the project more significantly on federally managed lands, rather than using a contrived federal evaluation process to justify pushing the transmission line predominately onto private property, where the impacts to the natural and human environments have not been appropriately evaluated, and are likely much more significant than the impact to most federally managed land because of the environmental, cultural, economic, and social justice considerations. For this reason, Baker County believes a reasonable range of alternatives have not been evaluated; alternatives that were more significantly sited on federal land were eliminated early in the process because of a lack of information about the actual impact to the natural and human environment than other proposals that are included in this analysis. Baker County supports further evaluation of the viability of utilizing the existing utility corridor that travels through Central Oregon rather than cutting a new transmission corridor through valuable public and private lands in Baker County.

Specific siting issues

If you find that there is a valid need for the project, which our comments above question, then Baker County would like to raise some issues and suggestions with specific portions of the proposed routes. Baker County has raised and continues to raise the following three problematic issues with the selected route through Baker County:

- The Durkee/Burnt River Alternative

C1h

Baker County has committed a significant amount of time in an attempt to mitigate the devastating effects of the environmentally preferred alternative route to the Durkee community. The alternative as mapped transects one of only two sites containing high value soils in Baker County (Durkee and Richland).

C1i

The DEIS fails to address this fact from an environmental or a socio-economic standpoint, a material failure in the document. Additionally the DEIS fails to address the fact that 90% of the privately owned lands crossed are owned,

Baker County Comment on Boardman to Hemmingway DEIS

C1g

While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands and resources affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources on all lands such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). The BLM is addressing the protection and management of the federally protected resources rather than management of the land. If, in negotiations with private landowners, a landowner's preference for mitigation measures differs, other than the federally protected resources, the BLM will respect that through its compliance inspection contractor and the landowner will negotiate its preferences with Idaho Power. However, the BLM will ask for a signed statement to that effect to document the project record.

Alternative analysis has been revised to include additional routes and variations resulting from the Draft EIS comment period. Colocation with existing utilities is given preference where feasible.

C1h

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7

The economic analysis in Section 3.2.17 includes additional data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

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Baker County, Oregon (cont.)

C1i

managed and operated by seniors, many of whom are likely living below the poverty line. According to the U.S. Census Bureau (www.census.gov, accessed March 18, 2015), "as defined by the Office of Management and Budget and updated for inflation using the consumer price index, the weighted average poverty threshold for a family of four in 2013 was \$23,834." As public officials of Baker County, our experience tells us there are likely a significant number of households in the Durkee area that would fall below that threshold, many of whom for economic reasons may not be able to spare the time to participate in this process (especially in the large number of early meetings that were not held in Durkee) or have access to the internet to review the maps and documents associated with the project. The unjust impact on this under-represented population indicated not adequately considered and addressed, and when coupled with Baker County's assertion made above that a reasonable range of alternatives for this area is yet to be identified, discussed and analyzed, represents a material weakness in the DEIS. The County acknowledges that the Boardman to Hemingway project is being watched and the process studied by a group appointed by the White House, but does not agree that any level of national attention to the project could possibly justify the outsized impacts that are proposed to the residents of the Durkee valley.

C1j

Furthermore, the DEIS fails to recognize the fact that this alternative merely shifts the impact from one resource to another and does not address how this alternative meets the Oregon right to Farm Law and the Baker County Comprehensive Land Use Plan for the protection of Exclusive Farm Use land. The NEPA evaluation process does not fully take into account the value of farm ground and agricultural production; because decisions for federal land were never meant to fully take into account private land values. The EFSC process will account for that; however, the route determination through NEPA will fully determine the route on the private land- those processes are not truly happening concurrently as was discussed in the outset. Ho County continues to insist that the agricultural land values are as critical, if not more critical, than any of the resource values identified by the BLM and evaluated through the Draft Environmental Impact Statement. Baker County is critically dependent on our agricultural economy, and we insist that the BLM recognize through the Environmental Impact Statement analysis that the Durkee valley is a unique and critical component of our agricultural economy. Baker County only the Richland area and the Durkee valley have the warmer growing seasons necessary to produce higher value crops; other the County do not have the same long growing season or warmer nights to bring higher value crops to maturity or provide additional value to more traditional crops, such as higher yields or additional hay cuttings. The Baker County Planning Commission made a determination that the high value agricultural production areas are in Durkee and Richland. To compromise the

Baker County Comment on Boardman to Hemingway DEIS

C1i

The environmental justice analysis in Section 3.2.17 has been updated to further discuss how transmission lines may affect underserved and at-risk populations. Once the location for the transmission line route is identified, Idaho Power will coordinate with property owners to obtain rights-of-way through mutual agreements. Idaho Power will negotiate modifications to the line's design and the location of towers and access roads and compensate land owners for any unavoidable damages.

C1j

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7

The Final EIS provides detailed analysis related to land use and cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. See Section 3.3.3.7 for further detail.

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C1	Baker County, Oregon (cont.)	
C1j	<p>agricultural production potential or interrupt the accepted agricultural practices occurring in the Durkee area with a transmission line that can be sited in other places is an unacceptable prioritization of other values, which are not irreplaceable, with agricultural production, which is unique to each landowner and therefore is irreplaceable. Additionally, the cumulative effect of other types of utility corridors, including gas lines and fiber optic lines, place an unfair burden on the Durkee area's farming practices.</p>	
C1k	<p>The event that as Deciding Officer, you determine that the community developed alternative (attached as Durkee Community Alternative) the county would request that you focus on the efforts the community has made towards the Idaho Power Proposed Route. The County has worked closely with the Oregon Department of Fish and Wildlife, and the community of Durkee to craft actions that would allow for the line to traverse the "Idaho Power Proposed Route" while this discussion has been on-going for multiple years, the DEIS fails to acknowledge the work undertaken by the community and the county. The county has proposed that mitigation be required for the minimal intrusion into sage grouse habitat on the east side of the freeway. ODF&W and Baker County has been engaged in discussions with the Oregon Governors Office which would allow for mitigation for minor intrusions in the sage grouse habitat. The county therefore insists "micro-siting" be addressed as an option for Durkee, and a working group be formed with representatives from Baker County, ODF&W, BLM, ODOE, the community of Durkee, and Idaho Power.</p> <ul style="list-style-type: none"> • Baker City/Flagstaff Mountain Alternative 	<p>C1k Comments noted. Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.</p> <p>C1l Comment noted.</p>
C1l	<p>Baker County acknowledges that the "Idaho Power Proposed Route" has significant environmental challenges, however the "Environmentally Preferred Alternative" likewise has significant critical issues that the DEIS has failed to address. Like the Burnt River Alternative, this "preferred route" impacts irrigated farm ground, and would make impossible such as pivot irrigation; additionally the farm ground is owned and managed by seniors and the lack of options such as pivot irrigation would potentially force the operator out of business. This was not taken into consideration when the socio-economic and social justice issues were addressed.</p>	<p>C1m The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.</p>
C1m		<p>C1m The economic analysis in Section 3.2.17 includes additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.</p>
C1n	<p>The DEIS does not recognize the fact that this alternative merely shifts the impact from one resource to another, and as mentioned above fails to meet the Baker County Comprehensive Land Use Plan.</p>	<p>C1n Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2.</p>
C1o	<p>This segment of the route, like that of Durkee, has remained the focus of Baker County since the onset of the proposal. Baker County has engaged in ongoing discussions with the landowners, AND Idaho Power to develop a</p>	<p>C1o Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.</p>

Baker County Comment on Boardman to Hemmingway DEIS

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Baker County, Oregon (cont.)

C10

“tolerable” alternative to the Virtue Flat route. This discussion resulted in Idaho Power agreeing to consider micro-siting in this segment and relocating the current 230 volt line and the proposed line on the same structure to the east of the current 230 line, thereby removing the 230 structures from the irrigated farm land and placing them on the dry uplands to the east.

The DEIS fails to address the ongoing work by the county and does not require the applicant to work with the county and the affected landowners to bring this matter to a “tolerable” resolution.

- Mitigations

One of the County’s largest concerns for this proposal from the outset has been the visually sensitive areas around the National Historic Oregon Trail Interpretive Center. If the proposal is approved along a route that will be visible from the Interpretive Center, the County requests the following options be considered to mitigate the substantial visual impact and

C1p

1. The area is already the site of an existing transmission line, and some area residents have expressed an interest in seeing this existing transmission line co-located on the same towers as the proposed Boardman to Hemmingway line. While the co-location of these transmission lines on the same set of towers may not be typical engineering practice, non-typical is not the same as non-feasible. If the significant visual impacts and the amount of impact to the landowners in that area can be reduced in this manner, Baker County requests that this option be included in the EIS.

C1q

2. The required distance between the existing transmission line and the proposed transmission line has been a long-standing siting issue for this project. It is Baker County’s understanding that the siting guidance is changing for required distance between, and Baker County asks that in areas where the required distance between the two transmission lines is creating impacts on other resources, including visual, environmental, social and economic, the required spacing distance be drastically reduced to the absolute minimum allowed. Siting these two transmission lines closer together and grouping their impact could significantly reduce the undesirable impacts on other resources, much to the benefit of all residents of Baker County, particularly the private landowners whose land is proposed to be traversed by the proposal.

Baker County Comment on Boardman to Hemmingway DEIS

C1p

Comment noted. The requested action does not meet the need of the project and has not been included in the project description by Idaho Power.

C1q

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Colocation with existing utilities is given preference where feasible. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

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C1	Baker County, Oregon (cont.)	
<p>C1r</p> <p>C1s</p> <p>C1t</p> <p>C1u</p>	<p>3. The visual impacts of the towers have generated much discussion in all areas, but particularly in the area of the Interpretive Center as discussed above. These towers certainly stand out to a greater degree when the background is sky rather than land, but can stand out in many situations and in many different lights. Beyond the “skylining” effect of having sky behind the tower, the next largest visual intrusion is the reflectivity of the metal used to construct the towers. In areas with visual sensitivities or visual resource values, Baker County asks that Idaho Power be required to use less reflective materials for the towers. That could be a paint coat that more closely matches the background of the area, a covering that absorbs more light and reflects less, or another kind of technology. Regardless of the kind of technology used to reduce reflectivity, Baker County requests this mitigation be required in visually sensitive areas. The short-term cost to Idaho Power in the additional effort these tower types will require is negligible by comparison to the long-term community burden of living with these towers far into the future.</p> <p>4. National Historic Oregon Trail Interpretive Center, Overlay Zone At the Request of The BLM, prior to the siting of the NHOTIC in Baker City, certain assurances of view shed protection were required. Baker County accomplished this action by the adoption, implementation and enforcement of Baker County Zoning Ordinance Chapter 650, a short summary of this chapter “the overlay is meant to retain the historical character of the landscape...” Baker County has faithfully remained committed to adhering to the agreement by holding private landowners to the requirements. On May 20, 2005 David Henderson, BLM Vale District Manager signed an MOU with Baker County agreeing to coordinate all planning efforts with Baker County. This agreement was breached in that the DEIS fails to have the review and approval of the NHOTIC of the “Flagstaff Alternative” included in the document. Baker County questions why private landowners should be held to a higher standard than the BLM for visual impacts occurring within the NHOTIC View shed. The DEIS fails to balance out this issue, leaving the county with the conclusion that NHOTIC view shed private land owners are victims of discrimination and once again the social justice component of the DEIS fails to take this into consideration.</p> <p>Also regarding mitigation, the County believes that the DEIS, especially the route selection, has given undue and unsupportable preferential treatment to Sage Grouse habitat that is considered “Low Density”. Mitigation can and should have been considered as a more viable option in areas with competing</p> <p><i>Baker County Comment on Boardman to Hemmingway DEIS</i></p>	<p>C1r The project includes design features to minimize visual potential visual impacts, including use of dull-galvanized steel for lattice towers and non-specular conductors. Selective mitigation measures have also been considered and applied to areas of higher sensitivity.</p> <p>C1s Comment noted. Design features and selective mitigation measures applicable to visual resources have been included in Chapter 2, Tables 2-7 and 2-13. In addition the analysis of visual resources has been expanded to include discussion of where selective mitigation measures for visual resources will be applied.</p> <p>C1t Analysis has been expanded to include alternative route variations with careful consideration of county lands, zoning, and colocation with existing facilities (including transportation facilities) to avoid or minimize impacts from the B2H Project. See Sections 2.1.1.3 (Recommended Route-Variation Options), 3.2.6 (Zoning) and 3.2.12 for further detail.</p> <p>Baker County Zoning Ordinances have been added to the assessment of impacts on trail management.</p> <p>C1u See next page for response for C1u.</p>

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Baker County, Oregon (cont.)

C1u

resource impacts; habitat impacts, especially habitat of lesser importance than the "Core Areas", absolutely can be mitigated for. While Baker County acknowledges that habitat concerns for the Sage Grouse are a trendy topic right now, the trend will move on to something else with time, and Baker County will be stuck with the legacy of a transmission line that was planned in a short-sighted manner around the poorly mapped habitat of a single species, where due consideration to reasonable route alterations and mitigation was simply not given. Areas where Sage Grouse resource concerns conflict with other resource concerns deserve reconsideration with an eye toward when mitigation is reasonable and necessary.

In closing, Baker County has remained engaged and expended considerable effort in attempting to protect its residents, economy, and natural resources from the potential negative effects of the siting of the proposed line through Baker County. While the county is submitting comments on the proposed DEIS, this should not be construed as the County accepting the failure of the BLM to address the county's issues as addressed in the January 29, 2009 letter or accepting a DEIS that doesn't appropriately consider all alternatives.

Baker County has appreciated your willingness to meet with the County and various community groups, and requests that the EIS resolve the issues as raised by not only the County, but also its residents, which is truly for the benefit of the entire project.

Sincerely,



Baker County Board of Commissioners

Attachment 1: Letter to David Henderson, Vale BLM, dated January 29, 2009

Attachment 2: Baker C

Attachment 3: Durkee Community Alternative Map

Baker County Comment on Boardman to Hemmingway DEIS

C1u

While federal land-managing agencies do not have authority over nonfederal lands, federal agencies do have an obligation to disclose effects of its decisions on lands and resources affected by the decision. Therefore, the BLM uses the same systematic, defensible approach on all lands, regardless of jurisdiction, to analyze and compare the alternative routes, using consistent data and approach. In addition, as the lead federal agency for the EIS, the BLM is the federal steward for federally protected resources on all lands such as cultural resources (under Section 106 of the NHPA), biological resources (under Section 7 of the ESA), and paleontological resources (under the Paleontological Resources Protection Act). The BLM is addressing the protection and management of the federally protected resources (i.e., regardless of land jurisdiction) rather than management of the land. If, in negotiations with private landowners, a landowner's preference for mitigation measures differs, other than the federally protected resources, the BLM will respect that through its compliance inspection contractor and the landowner will negotiate its preferences with the Applicant. However, the BLM will ask for a signed statement to that effect to document the project record.

ATTACHMENT**C1****Baker County, Oregon (cont.)****ATTACHMENT 1.
BAKER COUNTY COMMENTS**

January 29, 2009

Michael Graine, Director
Oregon Department of Energy
625 Marion St. NE
Hemmingway
Salem, OR 97301

Eric Hackett
Project Manager
Boardman to

Transmission Line
Idaho Power Company
PO Box 70
Boise, ID 83702

David Henderson, District Manager
Vale District, Bureau of Land Management
100 Oregon Street
Vale, OR 97918

Dear

RE: Idaho Power Boardman to Hemmingway Transmission Project

Baker County strongly objects to the manner in which the Idaho Power Boardman to Hemmingway Trans
Baker County. Historically, we have enjoyed a positive working relationship with Idaho Power and the BLM, but in an adversarial role which will have extremely negative impacts on all entities involved. I will attempt to frame our issues with the process so that we may begin to address solutions which provide satisfaction to the Baker County Commissioners and the citizens of our County.

- 1) Baker County was not consulted in advance of the potential routes and allowed an opportunity to work with the applicant in se would have minimal impact on our citizens private lands and which protect the customs, cultures and values of Baker County.
- 2) We believe that the BLM was consulted prior to the County and their objections and input on the proposed route resulted in the alternative which traverses 88% private land and 12% public lands.
- 3) We believe that based on the proposed route, BLM is in no position to be the lead agency in the project and formally request that the Oregon Dept. of Energy and the Energy Facility Siting Council designate each County the lead agency or some consortium to lead the endeavor to protect private lands in this process. Baker County would be interested in discussing these issues.

Baker County Comment on Boardman to Hemmingway DEIS

C1v

Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

C1w

Responding to the application for right-of-way across lands it administers the responsibility of BLM and other land-management agencies.

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.

ATTACHMENT**C1****Baker County, Oregon (cont.)**

C1x

- 4) BLM has received funding from the applicant to address NEPA issues for public lands. The Counties and their citizen advisory committees have largely been forced to address issues with little funding and no formal way to address the scientific data which is the basis for siting this project. The playing field is significantly adverse to private lands and our citizen's interests. Baker County is being asked to cooperate in this process but we are coming to the table at a definite disadvantage.

C1x

Comment noted.

C1y

- 5) Baker County is willing to coordinate with all parties in this process. We therefore ask the Oregon Dept. of Energy for the following information.
- a. Procedure for Baker County to procure funding to analyze alternative routes with some level of scientific expertise.
 - b. Procedure for Baker County to receive criteria and data from federal and state agencies which relate to siting of the project and funds to analyze the data to the public's satisfaction.
 - c. Dept. of Energy rules, regulations and policies to assess the environmental impacts to private lands and which entity will be tasked with this and have oversight over this project. We request that Baker County be consulted on this process for private lands within our County.

In closing, Baker County requests a joint working group composed of representatives from BLM, IPC and the Oregon Dept. of Energy to develop a route through Baker County with alternatives to meet the objectives of this project. We propose that this group be toward solutions which protect private and public lands while protecting the customs, culture, values and economic base of the County. In addition, the County requests adequate funding to conduct peer reviews of the outcomes of all NEPA and environmental impact documentation provided by the various entities. Though we believe that this process may have some serious flaws, we are willing to coordinate with all affected entities to reach outcomes which are in the best interest of the citizens of Baker County and the needs of the nation for transmission capacity. We look forward to working with you to address our concerns.

Baker County Comment on Boardman to Hemmingway DEIS

C1y

Comment noted. The BLM appreciates Baker County's participation in the preparation of the EIS as a cooperating agency.

Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

ATTACHMENT

C1	Baker County, Oregon (cont.)
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Sincerely,

Fred Warner, Jr.
Baker County Commission Chair

Baker County Comment on Boardman to Hemingway DEIS

ATTACHMENT**C1****Baker County, Oregon (cont.)****ATTACHMENT 2
BAKER COUNTY COMMENTS**

C35 00 0447

BLM MOU# OR-030-2005-001

MEMORANDUM OF UNDERSTANDING (MOU)
 BETWEEN
 BAKER COUNTY, OREGON
(hereinafter called "the County")
 and the U.S.D.I. BUREAU OF LAND MANAGEMENT, VALE DISTRICT BAKER
 FIELD OFFICE
(hereinafter called "the BLM")

Signed
 5-20-2005

County Court Journal

SECTION I. STATEMENT OF PURPOSE

The purpose of this Memorandum of Understanding (MOU) is to establish government-to-government communications and productive planning relationships between the County and the BLM. This MOU addresses how and when each agency participates in BLM and County planning processes. Successful implementation of this MOU will promote positive intergovernmental relationships.

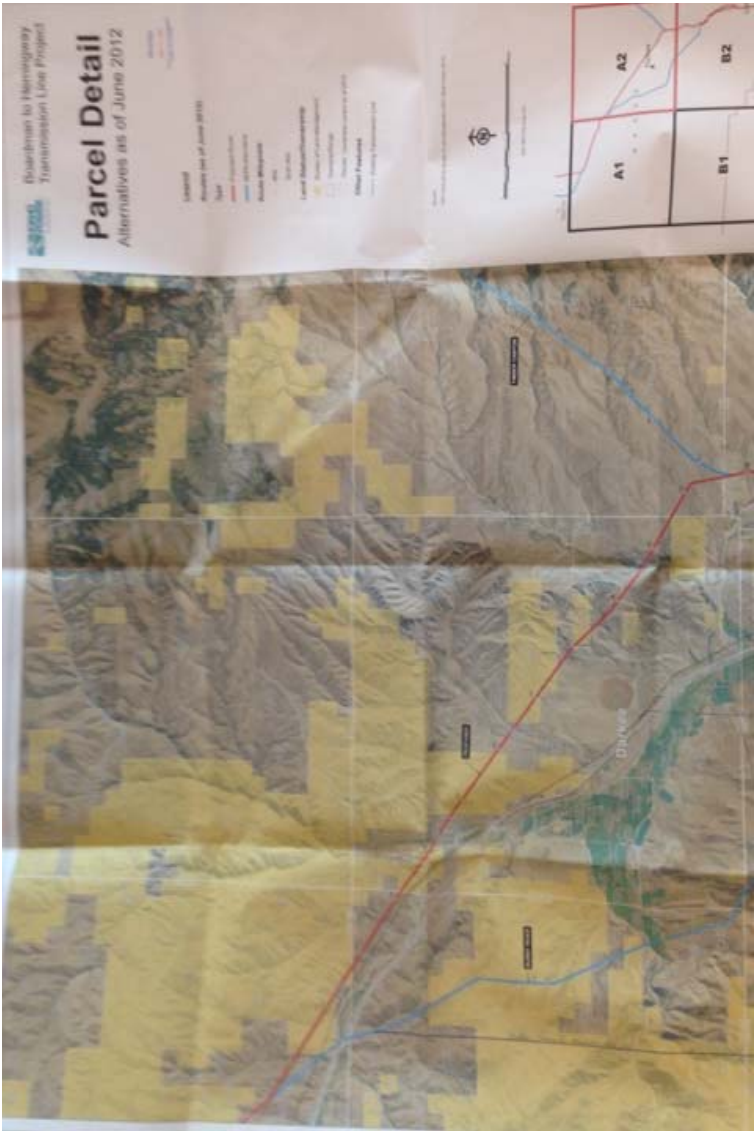
SECTION II. BACKGROUND

- A. WHEREAS, it is recognized that the BLM manages public lands in accordance with Federal Land Policy and Management Act of 1976 (FLPMA) as amended, 43 U.S.C. 1701 et seq.
- B. WHEREAS, this Act sets forth the policy of the United States concerning the management of the public lands and requires among other things that goals and objectives be established by law as guidelines for public land use planning, and that the management of the public lands be conducted under the principles of multiple use and sustained yield; in a manner that recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber, and in a manner that protects the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource and archaeological values of the public lands. The Act also states that lands will be managed, where appropriate, to preserve and protect certain public lands in their natural condition to provide food and habitat for fish and wildlife and domestic animals, and to provide for outdoor recreation and human occupancy and use.
- C. WHEREAS, it is recognized that the BLM is committed to the furtherance of intergovernmental cooperation as outlined in the Intergovernmental Cooperation Act of 1968, 31 U.S.C. 6501-6506; and
- D. WHEREAS, the BLM acknowledges and endorses the policy of the Congress of the United States as stated above that federal agencies, including the BLM, to the extent possible, will take into account all viewpoints and objectives - national, regional, state and local - in the formulation, planning and administration of programs and development projects and that insofar as possible and consistent with national

Baker County Comment on Boardman to Hemmingway DEIS

ATTACHMENT

C1	Baker County, Oregon (cont.)
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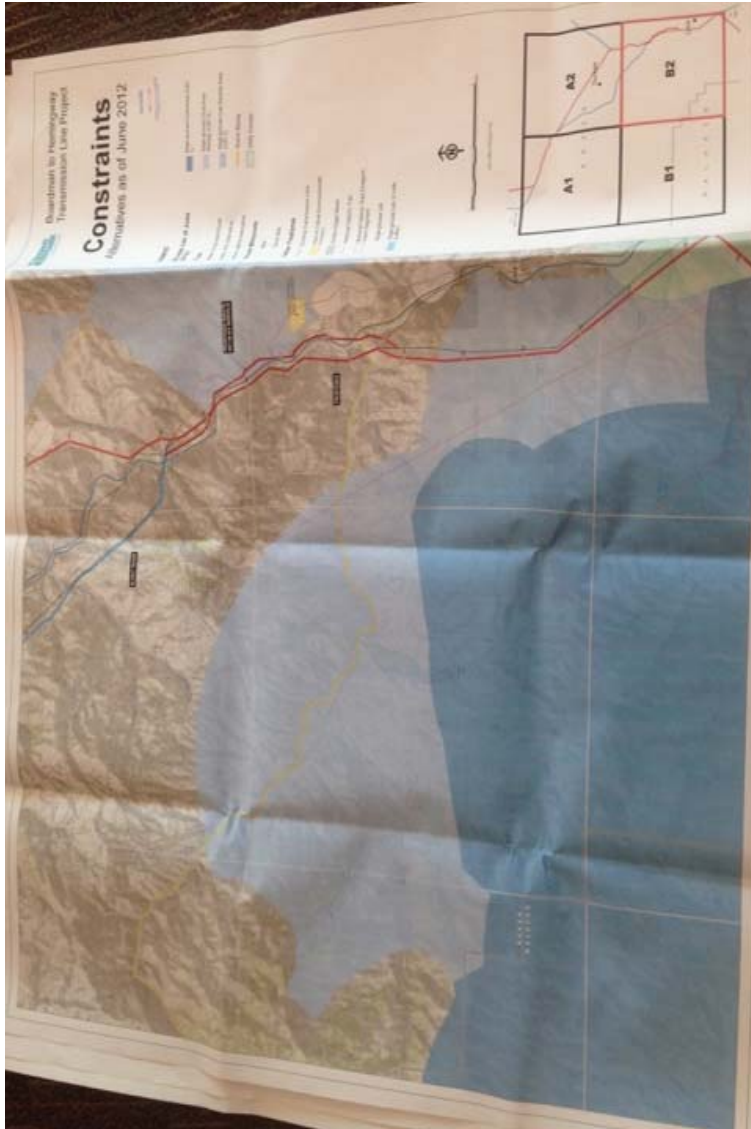


ATTACHMENT

C1

Baker County, Oregon (cont.)



ATTACHMENT**C1****Baker County, Oregon (cont.)**

ATTACHMENT

C1	Baker County, Oregon (cont.)
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ATTACHMENT

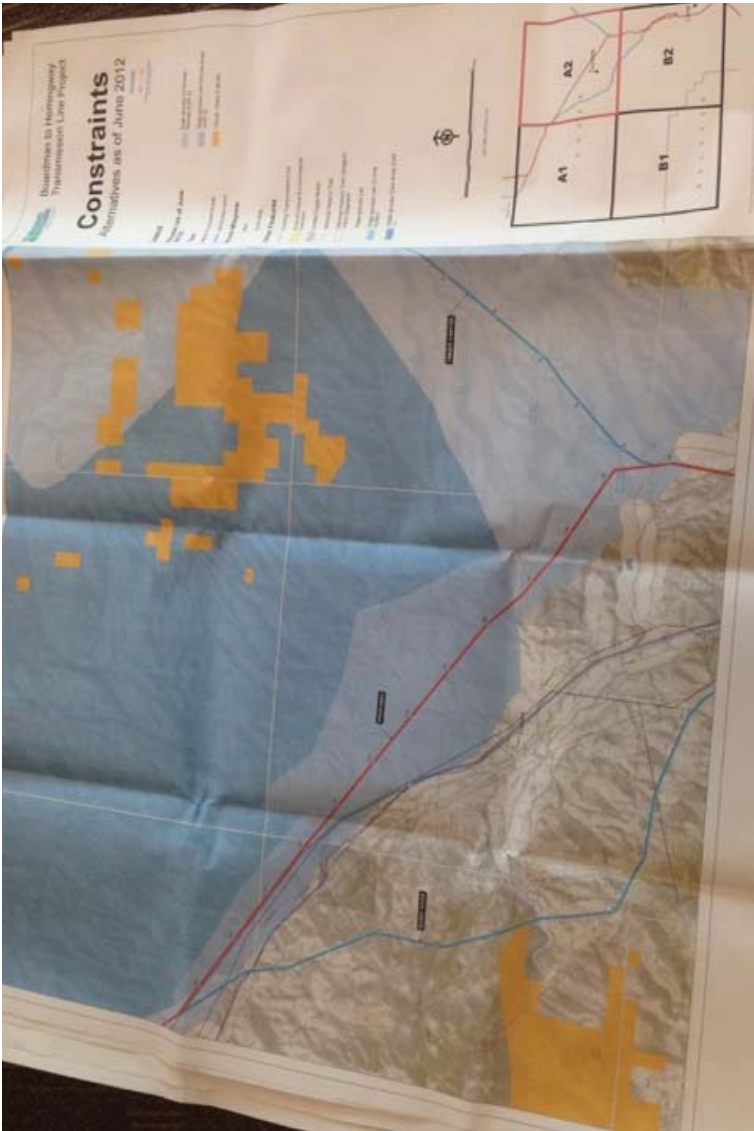
C1

Baker County, Oregon (cont.)



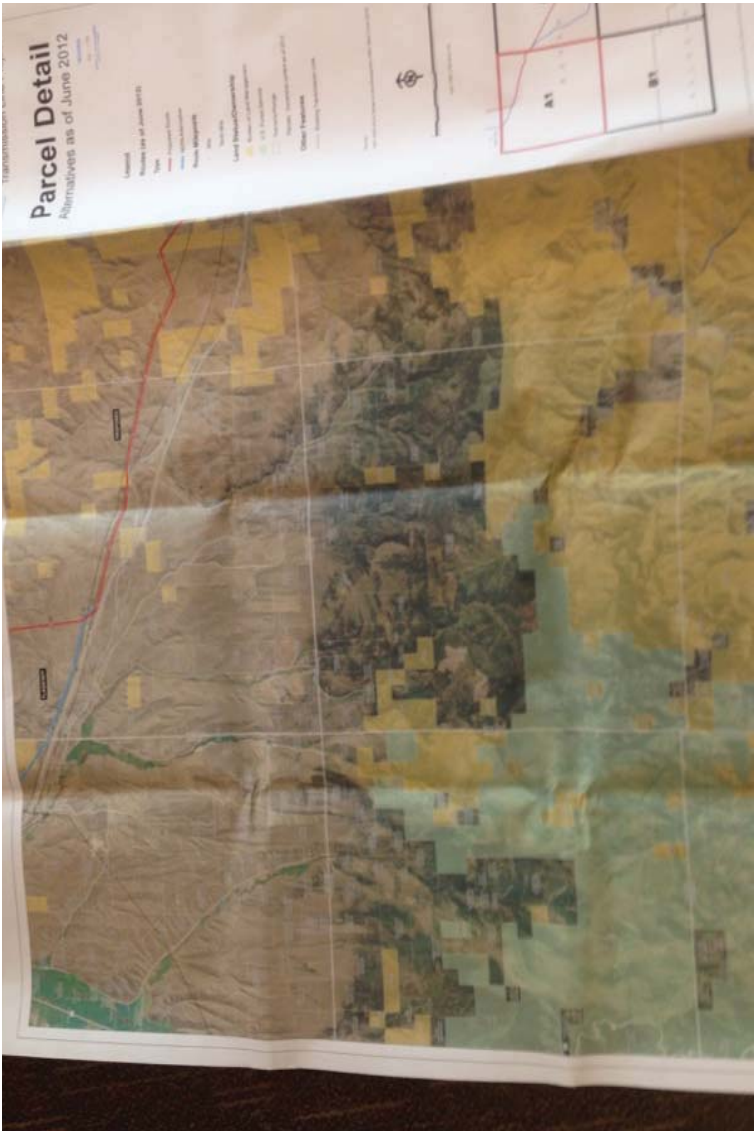
ATTACHMENT

C1	Baker County, Oregon (cont.)
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ATTACHMENT

C1	Baker County, Oregon (cont.)
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ATTACHMENT

C1

Baker County, Oregon (cont.)



ATTACHMENT

C1	Baker County, Oregon (cont.)
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COMMENT(S)		RESPONSE(S)
C2	<div>Burnt River Irrigation District</div> <div><div>comment@boardmantoheatingway.com</div><div><div>From:</div><div>Sent:</div><div>To:</div><div>Subject:</div></div><div>EnviroLytical - B2H <info@envirolytical.com> Monday, February 09, 2015 8:13 AM comment@boardmantoheatingway.com New Communication: The Burnt River Irrigation District and Patrons would like to go on record protesting the placement of any part of the power line on or over any irrigated lands within the Irrigation District Boundari</div></div> <div><div>C2a</div><div><div>Wesley Morgan <morganwc@q.com> https://el2.envirolytical.com/communication/view/101834 The Burnt River Irrigation District and Patrons would like to go on record protesting the placement of any part of the power line on or over any irrigated lands within the Irrigation District Boundaries.</div><div>Wesley Morgan Manager Burnt River Irrigation District</div></div></div>	<div>C2a</div> <div>Comment noted.</div>

COMMENT(S)

RESPONSE(S)

C3

Joint Committee of the Owyhee Project



COMMENT FORM

Date: 1-29-2015First Name: Michael Last Name: HortonOrganization or Affiliation (if any): Joint Committee of the Owyhee ProjectAddress: P.O. Box 1565City: Nyssa State: OR Zip: 97913E-mail address: mikehorton@fmtc.com Phone: 541-372-2268

Privacy Statement: Before including your address, phone number, e-mail address or other personal identifying information in your comment, be advised that your entire comment -- including comment to withhold identifying information, we cannot guarantee that we will be able to do so. your personal

☐ Please check here if you wish your personal information to remain confidential.

Comments must be submitted by March 19, 2015.

My comments on the Boardman to Hemingway Transmission Line Project are:

(SEE ATTACHMENT)

Boardman to Hemingway Transmission Line Project | P.O. Box 655, Vale, OR 97918

COMMENT(S)

RESPONSE(S)

C3

Joint Committee of the Owyhee Project (cont.)

300294

STUNZ, FONDA, KIYUNA, & HORTON, LLP
ATTORNEYS AT LAWGENE STUNZ (1959-1992)
STEPHEN B. FONDA (1986-2006)
RETIREDGARY K. KIYUNA
MICHAEL W. HORTON**ADMITTED TO PRACTICE
IN IDAHO AND OREGON106 MAIN STREET
P.O. Box 1585
NYSSA, OREGON 97913
TEL (541)272-2268
FAX 5413722848

January 29, 2015

Boardman to Hemmingway Transmission Line Project
P.O. Box 655
Vale, OR 97918**RE: Boardman to Hemmingway Transmission Line Project**

Greetings:

I am General Counsel and Secretary of the Joint Committee of the Owyhee Project. I am submitting these comments on behalf of the Joint Committee of the Owyhee Project.

The proposed route near the Owyhee River creates potential problems with Bureau of Reclamation and Irrigation District facilities that the Malheur S Alternative does not. The topography of the land east of the Owyhee River where the proposed route is to cross the Owyhee River is highly unstable. The construction and location of the proposed power line in that area could cause catastrophic loss of the Kingman Lateral resulting in possible flooding and damage to the proposed power line itself. The lateral has slid off of the mountain in this area before. If the power line were to be constructed in this area, substantial mitigation, including the possible piping of the Kingman Lateral would be required. This area also includes an access road to the North Canal of the Owyhee Project and the Kingman Lateral. This is an area of high activity for personnel and heavy equipment. The placement of the power line in this area will put not only the heavy equipment and personnel at risk, but also the power line.

The proposed route also creates additional crossings of the South Canal which the Malheur S Alternative does not. These additional crossings are in areas of substantial activity in operating and maintaining the South Canal of the Owyhee Project. One of these additional crossings of the proposed power line over the South Canal is over a shallow siphon of the South Canal. This siphon is an underground concrete structure. Construction of the power line may put the integrity of that structure at risk.

The Joint Committee of the Owyhee Project recommends that the Malheur S Alternative be designated the preferred route.

Very truly yours,


Michael W. Horton
MWH/kg
CC: Jerrold Gregg, USBR

3

C3a

Comments noted. Landslide potential and potential areas of instability are assessed in the effects analysis.

C3b

Analysis has been expanded to include alternative route variations with careful consideration of opportunities for colocation of utilities and potential for utility conflicts. See Section 3.2.6 for further detail.

COMMENT(S)	RESPONSE(S)
C4	Malheur County, Oregon
	<div data-bbox="205 289 982 315"><u>comment@boardmantohemingway.com</u></div> <div data-bbox="205 328 982 414"><p>From: Kim Ross <Kim.Ross@malheurco.org> Sent: Wednesday, March 11, 2015 10:23 AM To: 'comment@boardmantohemingway.com' Subject: B2H comments from Malheur County Attachments: B2H.pdf</p></div> <div data-bbox="205 508 982 625"><p>Attached please find comments from the Malheur County Court regarding the recently issued EIS for the Boardman to Hemingway project Thank you, Kim Ross Executive Assistant Malheur County Court</p></div>

COMMENT(S)

RESPONSE(S)

C4

Malheur County, Oregon (cont.)



MALHEUR COUNTY

COUNTY COURT

251 B Street West, #5, Vale, Oregon 97918, (541) 473-5124, Fax (541) 473-5168

3/11/2015

B2H Project;

The Board of Directors for the Stop Idaho Power (SIP) organization met to discuss the Environmental Impact Statement (EIS) issued by BLM recently for the Boardman to Hemmingway (B2H) 500 kilovolt transmission line. SIP's mission was to keep the line from going over Exclusive Farm Use (EFU) land in Malheur County. Originally, the line crossed approximately 38 miles of EFU land in Malheur County in four different irrigated areas; Big Bend/Adrian, north of Nyssa along Gem Avenue, a segment that paralleled the siphon between Morgan Avenue and the Malheur Butte, and over farmland out by the SCRJ prison. The preferred alternative in the EIS goes through approximately 6 miles of EFU land in one irrigated area about six miles north of Vale. There are two remaining issues that SIP has identified with the "preferred alternative" in the EIS. One has already been mentioned above and that is the line is still crossing EFU in Malheur County; although a much smaller amount of EFU land is being affected. The other issue is the line crosses the Oregon Trail in two places; although BLM made sure the line crossed the Oregon Trail on private land so as not to impact the Oregon Trail Area of Critical Environmental Concern (ACEC) which envelopes the Oregon Trail on BLM land. SIP still feels that the line should be west of Brogan but with the sage grouse issues in that area, it probably will not happen. SIP has not been contacted by any land owner on the Tub Mountain alternative for help in fighting the line. SIP has concluded that the preferred alternative is not ideal for SIP or Malheur County but it is probably the best route that we can hope for due to the sage grouse issue.

Dan P. Joyce, County Judge

Don Hodge, County Commissioner

Larry Wilson, County Commissioner

C4a

C4b

C4a

Comment noted.

C4b

Impacts on the Oregon NHT have been expanded to include effects on private lands where trail resources have been identified to facilitate an equal level of analysis to inform route selection.

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court

comment@boardmantoehemingway.com

From: Melissa Thom <mthom@enviroissues.com>
Sent: Monday, March 23, 2015 4:50 PM
To: comment@boardmantoehemingway.com
Subject: FW: Morrow County Court - Comment to BLM B2H dEIS
Attachments: B2H DEIS Cmt Tbl Morrow County 03182015.xls; CC BLM dEIS Comment Letter 031815 signed.pdf; Wind projects and Met TowersNov13.pdf



Melissa Thom
associate

950 W Bannock, Ste 800 / Boise ID 83702
 m:208.385.0128 / d:208.515.3515 / c:208.731.1589
www.enviroissues.com

From: Straub, Renee [mailto:rstraub@blm.gov]
Sent: Monday, March 23, 2015 4:47 PM
To: Melissa Thom; Katie Hartman
Subject: Fwd: Morrow County Court - Comment to BLM B2H dEIS

FYI - for Comment Database.

Renee Straub
 B2H – Vale District Project Coordinator
 Authorized Officers Representative
 Vale District
 100 Oregon St. Vale, Oregon 97918
 541-473-6289 - Office
 541-473-6213 - FAX

----- Forwarded message -----

From: **Carla McLane** <CMclane@co.morrow.or.us>
Date: Wed, Mar 18, 2015 at 3:45 PM
Subject: Morrow County Court - Comment to BLM B2H dEIS
To: "Gertsch, Tamara" <tgertsch@blm.gov>, "Straub, Renee" <rstraub@blm.gov>, "swhitesides@blm.gov" <swhitesides@blm.gov>, "Gonzalez, Donald" <dgonzale@blm.gov>
Cc: Terry Tallman <TTallman@co.morrow.or.us>, Leann Rea <LRea@co.morrow.or.us>, Don Russell <DRussell@co.morrow.or.us>, Karen Wolff <KWolff@co.morrow.or.us>, Roberta Lutcher <RLutcher@co.morrow.or.us>, "Maffuccio, Jeff" <JMaffuccio@idahopower.com>, "Garrett, Kirby" <Kirby.Garrett@mail.house.gov>, "Kathleen Cathey@wyden.senate.gov" <Kathleen_Cathey@wyden.senate.gov>, "Wagner, Karen (Merkley)" <Karen_Wagner@merkley.senate.gov>, Margi Hoffmann <Margi.HOFFMANN@oregon.gov>, "Woods, Maxwell" <maxwell.woods@state.or.us>, "bbeyeler@cityofboardman.com" <bbeyeler@cityofboardman.com>, "don.rice@gwrglobal.com" <don.rice@gwrglobal.com>, Rick McArdle <rick.mcardle@navy.mil>

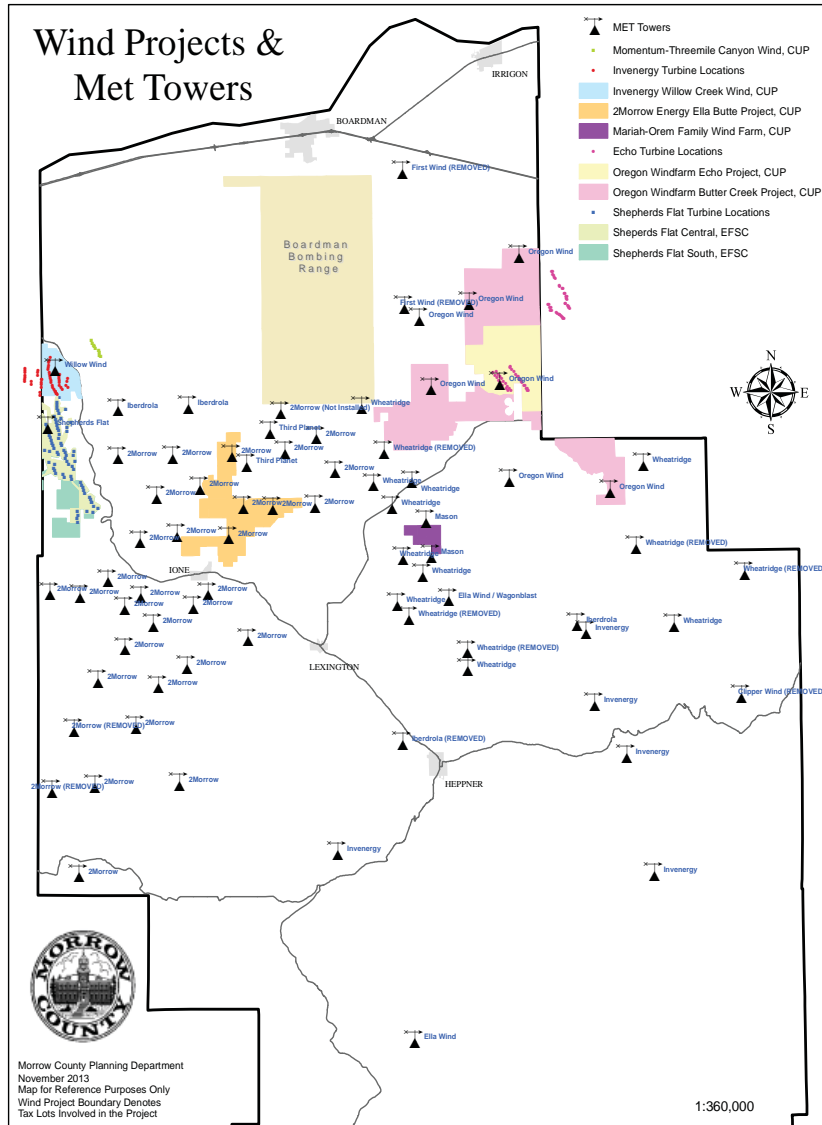
COMMENT(S)	RESPONSE(S)
C5	Morrow County Court (cont.)
<p>Tamara, Renee, Scott and Don,</p> <p>Please find attached the Morrow County comment. Thanks for the opportunity.</p> <p>Please let me know if you have any trouble with the documents.</p> <p>Carla McLane</p> <p>Planning Director</p> <p>Morrow County</p>	

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)



COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)



P. O. Box 788 • Heppner, Oregon 97836
(541) 676-5620 • FAX (541) 676-5621

COUNTY COURT

TERRY K. TALLMAN, Judge
email: ttallman@co.morrow.or.us
Boardman, Oregon
LEANN REA, Commissioner
email: lrea@co.morrow.or.us
Heppner, Oregon
DON RUSSELL, Commissioner
email: drussell@co.morrow.or.us
Boardman, Oregon

March 18, 2015

Tamara Gertsch, BLM National Project Manager
Boardman to Hemingway
Transmission Line Project
PO Box 655
Vale, OR 97918

Dear Ms. Gertsch:

The Morrow County Court thanks you for the opportunity to comment on the Bureau of Land Management's draft Environmental Impact Statement (dEIS) for the Boardman to Hemingway transmission line proposed by Idaho Power Company (IPC). Morrow County will attempt within this letter to share with you comment on the specific routes identified within the dEIS, request that additional routes be further evaluated, discuss the socioeconomic considerations, complete a chapter by chapter review of the dEIS, and provide both conclusions and recommendations that Morrow County would request that the BLM consider as they review the comments submitted. The Morrow County Court recognizes the considerable work that the BLM has done to date and that still needs to be completed as this project moves forward, hopefully, to construction.

Specific Route Concerns:

The dEIS identifies four routes in the Morrow County area - the proposed route with a terminus of the Grassland substation, the Horn Butte Alternative, the Longhorn Alternative and the Longhorn Variant. Through various discussions the County would share the following about each of the identified routes.

Grassland Project Proponent Proposed Route:

While this is the proponent proposed route it has been well established that this terminus no longer serves a purpose for IPC or the needs of the B2H project. At the time the Plan of Development and amended SF299 were submitted by IPC in 2011 Portland General Electric (PGE) had proposed the Cascade Crossing transmission line and a connection at Grassland allowed for better integration into the grid and the larger electrical network. Those conditions have changed dramatically with PGE suspending indefinitely the Cascade Crossing project. While Morrow County supports 'a southerly route' a terminus at Grassland no longer makes sense.

Horn Butte Alternative:

Locally there has been discussion that 'a southerly route' is preferred. As this discussion has matured, but still needs work, local interests admit that the Horn Butte Alternative is probably not the solution, but the analysis to this point is mostly valid and helpful. The landowner

Page 1 of 5

C5a

C5a The analysis Final EIS addresses changes in the Applicant's project description.

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)

impacts of the proposed line that would parallel the southern edge of both the Naval Weapons Systems Training Facility (NWSTF) Boardman and the conservation area, while not negligible, would be different than impacts of a transmission line that aligns with the eastern boundary of the NWSTF Boardman, a scenario that is concerning to those adjoining landowners on both sides of Bombing Range Road. Please see discussions later in this letter.

Longhorn Alternative:

There is no better way to say this - this route is atrocious. It runs ramrod through the Boardman tree farm along with two dairies on its way to the proposed Longhorn substation. The impact to agricultural production could not be greater, and each 90 degree angle as the route cuts its way through the area takes even more agricultural land out of production. Dairies rely on aerial application of various crop inputs, including seeding, and the location of the line would devastate both dairies, and would probably render them inoperable in short order. The Boardman tree farm could not grow their crop (Pacific Albus) under the proposed line or within the 250 foot wide easement. While Morrow County does not have a total number of affected acres for this line alternative and its financial impact, it is our understanding that analysis has been done and will be submitted by the landowner group.

Longhorn Variant:

Morrow County would find that this route may prove to be the second best alternative, but this is put forth with trepidation. We do find that the analysis within the dEIS is lacking clarity and does not adequately address the impacts to either set of landowners along the road. Locally the discussion has focused on the need for a 'west of Bombing Range Road' alternative while the Longhorn Variant as presented is viewed as an 'east of Bombing Range Road' alternative. BLM staff have stated that the analysis could be applicable to either side of the road; Morrow County disagrees. The financial impact to the landowners has not been identified or considered and neither has the operational impact to the Navy been fully vetted.

Another component of this variant that has not been given consideration are the wind energy facilities proposed in central Morrow County that need to have a route to move their generated power to the market, which is done via the grid, and locally that is predominately the Bonneville Power Administration (BPA) power lines that are in northern Morrow County. Attached is a current met tower map for Morrow County based upon permits issued for met towers. The map also shows boundaries for permitted projects, with some already built. The met towers represent approximately 2,000 megawatts (MW) of potential wind energy development. This development would require multiple small transmission lines, or one 230 kilovolt(kV) transmission line (which would be Morrow County's preference). The dEIS does not take these future projects into consideration as a number of proposed projects are found lacking in Chapter 3 Table 3-315 Reasonably Foreseeable Future Actions. Notably missing is the Navy's proposed actions to allow Oregon National Guard use of the NWSTF Boardman, the Carty Generating Station, and at least two wind energy projects that have submitted at least a Notice of Intent to the Oregon Department of Energy for a Site Certificate (see more explanation as part of the chapter by chapter portion of this letter below).

Routes to be Evaluated not Currently in the dEIS:

Based on the comment above Morrow County believes there are two additional routes that need to be either added to the EIS or receive more clarity within the EIS. These include a route we have identified as the Slatt Alternative, a new route or more appropriately a continuation of the

Page 2 of 5

C5b

A discussion of impacts on confined animal feeding operations, aerial spraying, and tree farms on the Longhorn Alternative is included in Sections 3.2.7.2, 3.2.7.5, and 3.2.7.6.

C5c

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project, Chapter 3 has been expanded to provide more description of the methods used for analyzing effects associated with each resource (tiered to the overall approach) and to provide more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment. In addition, a map volume of large-scale maps is provided to present resource data and to show the level of residual impact on the resources along all of the alternative routes.

C5d

Comments on the Draft EIS expressed that not enough information was provided in the Draft EIS to enable the reviewers to understand where impacts would occur and where mitigation would be applied to reduce impacts. Chapter 2, Section 2.5.1 of the Final EIS presents an explanation of the study and analysis approach employed for the B2H Project. Chapter 3 has been expanded to provide more description of the methods for used for analyzing effects associated with each resource (tiered to the overall approach). Chapter 3 also provides more information about the resources, mitigation applied to reduce impacts, and residual impacts on resources along each alternative route by segment, including cumulative effects.

Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS. New wind projects were added while some wind energy projects addressed in the Draft EIS may no longer be included in this analysis due to changing economic conditions and expiration of permits during the revision period between the Draft and Final EIS. See Section 3.3 for further detail.

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)

Horn Butte route, and the west of Bombing Range Road route, or more appropriately a clarification of the Longhorn Variant to assure that necessary landowner considerations are evaluated.

Slatt Alternative:

It is unclear to Morrow County if Slatt would be appropriate from an electrical perspective, however it does have appeal from a logistics perspective in Morrow County and would reduce impacts to irrigated agriculture in northern Morrow County and east of Bombing Range Road. Should the Slatt Alternative not work electrically there may be other opportunities along that portion of the BPA grid that could accommodate the B2H line as well as other connections that are needed in the region (including wind energy generation). Removing the B2H line from the Bombing Range Road corridor could also allow a more reasoned approach to installation of the needed transmission to support wind energy generation in Morrow County. Based on limited input from the BPA there needs to be both sufficient capacity and physical space to allow a new connection such as B2H and all parties are late in the process to have those answers at this time. The BLM needs to fully evaluate and consider the Slatt Alternative as part of this EIS process.

Longhorn Alternative - West of Bombing Range Road:

As stated above Morrow County does not feel that the current analysis of the Longhorn Alternative provides adequate input for decision makers, particularly in the need to evaluate the difference in impact that moving the line from one side of the road to the other makes. BLM staff have, in our opinion, made light of 'that slight adjustment.' There is nothing slight about it. The differences in impact to both the irrigated agriculture community and the NWSTF Boardman, and the proposed enhanced uses for the Oregon National Guard, could be immense.

Socioeconomic Considerations:

The socioeconomic considerations put forth for the agricultural activities in Morrow County are troubling, particularly in light of both the Longhorn Alternative and Longhorn Variant proposed routes. There is not a clear economic identification of the impact of the proposed transmission line to the affected properties based on the types of crops grown. There is not a mechanism to factor into the decision making process the economic impact of one route alternative versus any other alternative. Morrow County understands that the agriculture producers in Morrow County will be providing that input to the BLM, and Morrow County would urge the BLM to review it for inclusion into the final EIS and to use it for decision making purposes. This information and analysis could be incorporated into either or both the socioeconomic section as well as the route alternatives discussion within Chapter 2.

Morrow County understands that the National Environmental Policy Act (NEPA) requires that various environmental considerations be evaluated and that is the basis for this EIS, to accomplish that inventory and evaluation. Morrow County would encourage the BLM to not discount in that process the socioeconomic considerations of the decisions that will be made based upon this EIS.

Another important, but missing, component to serve as an input to this discussion is the Agricultural Protection Plan that is identified as part of the IPC Plan of Development (POD) dated November 2011. As part of the POD as Appendix I there is a Framework Agricultural

Page 3 of 5

C5e

Regarding consideration of the Slatt Substation, in a letter dated July 23, 2015, the Bonneville Power Administration, the sole owner of the Slatt Substation, informed the BLM that the Slatt Substation has no open 500-kV bays and there are "severe physical constraints" to expanding the substation to accommodate the B2H Project. Also, because the Slatt Substation is wholly owned by the BPA, the BPA's policy and rate schedules would require that BPA charge the Applicant and PacifiCorp for use of the substation (which would be passed onto the rate payers. In addition, a thorough study would have to be completed to determine whether the Slatt Substation could meet the B2H Project's objectives. Because the Slatt Substation is seriously constrained and technically infeasible, and does not meet the interests and objectives of the B2H Project and its partners, consideration of the Slatt Substation and an alternative route to the substation was eliminated from detailed analysis in the Final EIS (Final EIS Section 2.5.4).

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

C5f

The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.

The economic analysis in Section 3.2.17 includes additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C5g

Comment noted. The analysis of impacts on agriculture for all alternatives have been revised to include a quantitative analysis of important farmland, high-value farmland, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.6 for revisions.

The economic analysis in Section 3.2.17 has been updated with additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The revised analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)

C5g

Protection Plan that, when fully developed, may provide answers and options for agricultural producers to better work with IPC. If it were completed now, or if a broader document identifying actual economic impacts were available, it may make this discussion easier and appear to be more balanced. Another example might be Appendix B Agricultural Impacts Mitigation Plan that is part of Exhibit K Land Use from the preliminary Application for Site Certificate submitted to the Oregon Department of Energy. Morrow County would like to request that both this Framework Agricultural Protection Plan and possibly an agricultural economic impact evaluation be made a part of the final EIS and be provided to the agricultural producers to assist in any ongoing activity that may take place that would involve Morrow County or the agricultural producers from the time this comment period ends and the final EIS is released.

Chapter by Chapter Review of the dEIS:

Please see the attached table. A couple of the comments are similar or follow up comments made on the administrative draft EIS, but many are new. As a cooperating agency we would request the ability to continue to work with the BLM and your contractor to continue to make improvements to the overall document for both correctness and clarity.

Conclusions and Recommendations:

Morrow County would provide the following as conclusions and recommendations to the BLM about the dEIS and the local conversation concerning the B2H transmission line and its impacts in Morrow County.

C5h

- A southerly route is preferred. As discussed above the current Horn Butte Alternative and its respective analysis is mostly adequate, but would need to have additional analysis completed to a preferred terminus of the Slatt Substation.

C5i

- The Cumulative Impacts analysis does not adequately address two concerns - the multiple transmission lines that are proposed for the Bombing Range Road corridor or address the socioeconomic impacts of the B2H line on irrigated agricultural operations in north Morrow County. See the Chapter by Chapter review for more information on reasonably foreseeable future actions not currently identified that could further impact the Bombing Range Road corridor.

C5j

- The Longhorn Variant does not adequately distinguish the east side of the road from the west. The landowners are different and the activities are dissimilar. And the economics of the two actions cannot be compared, nor are they delineated. This dEIS is missing a crucial economic analysis of the agricultural operations under and adjacent to the proposed line.

C5k

- The dEIS does not address the potential for connected actions should the final route be some version of the Longhorn Variant. In order to accommodate wind energy generation and its associated transmission a number of actions may need to be taken to achieve a siting approval that would be consistent with the final EIS and any approval granted through the Energy Facility Siting Council. The final EIS should address these potential connected actions, including but not limited to relocation of current lines and development of transmission related to pending projects, associated with this routing variant.

Again, Morrow County thanks you for the opportunity to comment as part of this process. Should you have any questions about this letter please do not hesitate to contact Carla McLane,

Page 4 of 5

C5h

Comments noted. After the Draft EIS was released for public review, Idaho Power changed its Proposed Action from the previously preferred northern terminus at Grassland Substation, or alternative Horn Butte Substation to a northern terminus at Longhorn Station stating that, in the absence of the Cascade Crossing transmission line, neither the Grassland or the Horn Butte Substation would provide the required approximate 1,000 megawatts of bi-directional capacity and up to 1,500 megawatts of actual power-flow capacity. Therefore, the proposed Grassland or Horn Butte substations and the alternative routes to these substations do not meet the objectives of the B2H Project. Refer to Final EIS Sections 2.1.1.1 and 2.5.4 for more explanation.

Regarding consideration of the Slatt Substation, in a letter dated July 23, 2015, the Bonneville Power Administration, the sole owner of the Slatt Substation, informed the BLM that the Slatt Substation has no open 500-kV bays and there are "severe physical constraints" to expanding the substation to accommodate the B2H Project. Also, because the Slatt Substation is wholly owned by the BPA, the BPA's policy and rate schedules would require that BPA charge the Applicant and PacifiCorp for use of the substation (which would be passed onto the rate payers. In addition, a thorough study would have to be completed to determine whether the Slatt Substation could meet the B2H Project's objectives. Because the Slatt Substation is seriously constrained and technically infeasible, and does not meet the interests and objectives of the B2H Project and its partners, consideration of the Slatt Substation and an alternative route to the substation was eliminated from detailed analysis in the Final EIS (Final EIS Section 2.5.4).

C5i

A discussion of this potential effect has been added to Types of Potential Effects in Sections 3.2.7 and 3.3.4. Also, the Applicant has proposed an additional action to construct a 230-kV transmission line along Bombing Range Road for the potential wind farms that may in the future need to tie in to the grid. This 230-kV discussed is for each resource under the Applicant's Proposed Action and is referred to as Additional Action – 69-Kilovolt Line Replacement Options 1, 2, and 3. This is also discussed in Section 3.3.3.7.

The economic analysis in Section 3.2.17 has been updated with additional data on effects to irrigated farmland from the construction and operation of the B2H Project. The revised analysis assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C5j

See next page for response to C5j.

C5k

See next page for response to C5k.

COMMENT(S)**RESPONSE(S) - CONTINUED****C5****Morrow County Court (cont.)**

C5j

Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/ options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

The economic analysis in Section 3.2.17 includes additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances under the alternatives may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C5k

This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.

COMMENT(S)

RESPONSE(S)

C5


Morrow County Court (cont.)

the Morrow County Planning Director, at 541-922-4624 or by email at cmclane@co.morrow.or.us. Should you wish to speak to the County Court please contact Karen Wolff at 541-676-5620 or by email at kwolff@co.morrow.or.us.

Cordially,


Terry K. Tallman
Judge


Leann Rea
Commissioner


Don Russell
Commissioner

attachments:
Wind Projects and Met Towers, Morrow County Planning Department, November 2013
Chapter by Chapter Comment Table

cc:
Jeff Maffaccio, Idaho Power Company
Kirby Garrett, Congressman Walden's Regional Representative
Kathleen Cathey, Senator Wyden's Regional Representative
Karen Wagner, Senator Merkley's Regional Representative
Margi Hoffman, Governor Brown's Energy Policy Advisor
Max Woods, Oregon Department of Energy B2H Siting Officer
Barry Beyeler, Chair, Oregon Energy Facility Siting Counsel
Don Rice, Greenwood Resources
Rick McArdle, CPLO, US Navy

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)

Boardman to Hemingway 500-kV Transmission Line					
Comments on Draft EIS					
Section #	Page #	Line #	Table or Figure #	Reviewer Name/ Agency/ Program	Comment
C5l	Sec 1.10	1-36		Carla McLane/Morrow County	You've got this almost right. It should more accurately read, "EFSC review would require that each county issues a conditional use..."
C5m	Sec. 2.2.1	2-3 - 2-4	5 -28; 1-12	Carla McLane/Morrow County	Still a couple of road name problems... both an unnamed road that probably has a name, and there is no Grieb-Wood Road in Morrow County.
C5n	2.3.1.3	2-54 - 2-55	27 - 16	Carla McLane/Morrow County	The ongoing concern with the Longhorn Variant is the encroachment upon irrigated agriculture. Add to that the lack of economic analysis this encroachment creates leaves any analysis done here or in later portions of the dEIS seriously lacking. It is Morrow County's understanding that the agricultural producers will be providing economic value and analysis that the BLM needs to incorporate into the final EIS and use as part of the decision making process.
C5o	2.5.1	2-70 - 2-71	1-34 & 1	Carla McLane/Morrow County	Morrow County continues to be concerned that the overarching reason that the Longhorn Alternate was identified as the environmentally preferred alternative is to meet environmental considerations relating to the Oregon Trail. The applicants preferred route, south of the NWSTF Boardman, impacts less high value irrigated agricultural land, and if the Longhorn west of BRR Variation is not or cannot be evaluated, then Morrow County must continue to object to this environmentally Preferred Alternative. It simply does not take into account Oregon's system of value concerning land use activities, nor does it address the economic impact that this project, and this alternative in particular, will create.
	2.5.2	2-71 - 2-72	3-21 - 1-20	Carla McLane/Morrow County	While I do not have the specific numbers, I understand that the irrigated agricultural producers will provide more accurate information concerning the impacts that the Longhorn Variation will have. In the cover letter to this table Morrow County has identified that a west of Bombing Range Road evaluation needs to be completed and that it could possibly become a supportable alternative.
C5p	3.2.2	3-57 - ?		Carla McLane/Morrow County	This entire Water Resources section has reference to floodplain issues and discusses the national regulatory framework, but nowhere in the dEIS did I find acknowledgment that both the State of Oregon and the respective counties, including Morrow County, have floodplain regulations that would and should be applicable.

C5l [Comment noted.

C5m [Comment noted.

C5n [The analysis of impacts for all alternative routes (including the Longhorn Alternative and East of Bombing Range Road Alternative) in the Final EIS includes a quantitative analysis of irrigated agriculture. Refer to Section 3.2.7 under the heading Existing Agriculture.

C5n [The economic analysis in Section 3.2.17 includes additional data on impacts on irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C5o [Comments noted. Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

C5p [Comment noted. Text in the Final EIS addresses the regulatory floodplain aspect on a national and state level. Counties within both Oregon and Idaho are required to have flood hazard mitigation plans that include requirements from the National Flood Hazard Program.

COMMENT(S)

RESPONSE(S)

C5

Morrow County Court (cont.)

Boardman to Hemingway 500-kV Transmission Line					
Comments on Draft EIS					
Section #	Page #	Line #	Table or Figure #	Reviewer Name/ Agency/ Program	Comment
C5q	3.2.3	3-101 - ?		Carla McLane/Morrow County	Morrow County would request that coordination is required with the Morrow County Weed Manager.
C5r	3.2.6.2	3-394 - 3-396	all	Carla McLane/Morrow County	Near the bottom of page 3-394 a discussion of the Oregon Statewide Planning Goals begins, however it is incomplete. There are 14 Goals and only 3 are called out. All will be assessed by the ODOE EFSC process and all would potentially be considered by each of the respective counties.
C5s	3.2.6.17	unknown		Carla McLane/Morrow County	This section is missing. There is no Mitigation Planning portion of the Land Use, Agriculture, Recreation, Transportation chapter. Why?
C5t	3.2.7.5	3-582	20 - 22	Carla McLane/Morrow County	There are several statements in this section that are not fully correct, but one in particular is completely incorrect. The State of Oregon no longer owns the property west of the Naval Weapons Systems Training Facility Boardman, and hasn't for well over a decade. As to the future plans... they have pretty much been fully implemented. Not sure of the source for this, but it is very much out of date.
	3.2.11.5	3-901	table 3-267	Carla McLane/Morrow County	Under Morrow County there is a city listed by the name of Fairview. No such city in Morrow County... and it is fairly large so I probably would have noticed.
C5u	3.2.11.5	3-927	table 3-286	Carla McLane/Morrow County	There are two school districts in Morrow County that would be impacted - the Morrow County district and the lone district. Only the Morrow County district is listed.
C5v	3.2.11.7	3-951	10 - 14	Carla McLane/Morrow County	The Mitigation Planning does not account for the economic impact to irrigated agriculture as producers will need to amend agricultural practices or may have to reduce acres farmed based on the placement of a transmission tower. This analysis is incomplete and should more adequately address the farming practice impacts that the project will create.
C5w	3.3.3.1	3-1005	table 3-314	Carla McLane/Morrow County	The Carty Generating Station, currently under construction near the Boardman Coal Fire Plant, is not listed here (nor is it in the RFFA list).

Page 10 of 11

C5q [Comment noted. Details of the Noxious Weed Management Plan will be included in the Plan of Development for the project.

C5r [Noted, the State of Oregon currently defines 19 statewide planning goals as stated in the DEIS. Additional applicable statewide planning goals will be included in the Final EIS.

C5s [A subsection on mitigation planning and effectiveness is included in the Methods portion of each of these resources sections (refer to Section 3.2) in the Final EIS.

C5t [This has been corrected.

C5u [Comment noted.

C5v [The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture, which includes farming practices. Refer to Section 3.2.7. Tables 2-7 and 2-13 discuss design features and mitigation measures that would be employed to reduce impacts.

C5v [The economic analysis in Section 3.2.17 includes data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C5w [See response to Comment C5d.

COMMENT(S)**RESPONSE(S)****C5****Morrow County Court (cont.)**

Boardman to Hemingway 500-kV Transmission Line					
Comments on Draft EIS					
Section #	Page #	Line #	Table or Figure #	Reviewer Name/ Agency/ Program	Comment
3.3.3.2	3-1015 - 3-1017		table 3-315	Carla McLane/Morrow County	Lots of problems... 1) If Carty Generating is in the earlier list, why is the related pipe line here? 2) In the discussion of the UEC transmission line a 115 kV transmission line is mis-identified as a distribution line. 3) Three wind projects in Morrow County have been or are in the permitting process and should reasonable be listed here - Wheatridge (pASC has been submitted to ODOE), Heppner (NOI is on file with ODOE), and 2Morrow, being renamed to Ella Butte (previously had a NOI on file with ODOE). 4) If the Navy/Guard EIS, which is not final, is on the current list, why is the UCD redevelopment on the RFFA list? The land use actions are complete and the land sale is nearly complete with closure anticipated this calendar year. 5) The US 730 Corridor Refinement Plan was adopted by both Umatilla and Morrow Counties. Also why is it on this list? The plan is adopted and new development must meet the requirements. 7) If the US 730 Plan is listed, why not list all Interchange Area Management Plans that may apply. Specifically for the Longhorn Alternative and Variant the US 730/I 84/Bombing Range Road IAMP would be applicable. But again it is adopted and would be applicable. 8) The segment identified for a Baker County energy project is Segment 1.

C5x

C5x [See response to Comment C5d.

COMMENT(S)

RESPONSE(S)

C6

Morrow County Planning Department

comment@boardmantoehemingway.com

From: Melissa Thom <mthom@enviroissues.com>
Sent: Monday, March 23, 2015 4:52 PM
To: comment@boardmantoehemingway.com
Subject: FW: Morrow County MAAC B2H BLM dEIS Comment Letter
Attachments: 20150318164834109.pdf



Melissa Thom
 associate

950 W Bannock, Ste 800 / Boise ID 83702
 m:208.385.0128 / d:208.515.3515 / c:208.731.1589
www.enviroissues.com

From: Straub, Renee [mailto:rstraub@blm.gov]
Sent: Monday, March 23, 2015 4:50 PM
To: Melissa Thom; Katie Hartman
Subject: Fwd: Morrow County MAAC B2H BLM dEIS Comment Letter

FYI for the Comment - Database

Renee Straub
 B2H – Vale District Project Coordinator
 Authorized Officers Representative
 Vale District
 100 Oregon St. Vale, Oregon 97918
 541-473-6289 - Office
 541-473-6213 - FAX

----- Forwarded message -----

From: Carla McLane <CMclane@co.morrow.or.us>
Date: Wed, Mar 18, 2015 at 5:50 PM
Subject: Morrow County MAAC B2H BLM dEIS Comment Letter
To: "Gertsch, Tamara" <tgersch@blm.gov>, "Straub, Renee" <rstraub@blm.gov>, "swhitesides@blm.gov" <swhitesides@blm.gov>, "Gonzalez, Donald" <dgonzale@blm.gov>

Wanted to get this to you, but still need three signatures. Expect those tomorrow, but I will be out of the office.
 Carla

-----Original Message-----

From: Stephanie Loving
Sent: Wednesday, March 18, 2015 4:49 PM
To: Carla McLane

COMMENT(S)

RESPONSE(S)

C6

Morrow County Planning Department (cont.)

Subject: Message from "RNP00267390BA25"

This E-mail was sent from "RNP00267390BA25" (MP C4503).

Scan Date: 03.18.2015 16:48:34 (-0700)

Queries to: sloving@co.morrow.or.us

COMMENT(S)

RESPONSE(S)

C6

Morrow County Planning Department (cont.)



P. O. Box 40 • Irrigon, Oregon 97844
(541) 922-4624 or (541) 676-9061 x 5503
FAX: (541) 922-3472

March 18, 2015

Tamara Gertsch, BLM National Project Manager
Boardman to Hemingway
Transmission Line Project
PO Box 655
Vale, OR 97918

Dear Ms. Gertsch:

Morrow County established the Military Airspace Advisory Committee, or MAAC, almost three years ago and tasked them with identifying solutions to the local problems created by the Military Operations Area and Restricted Airspace attached to the Naval Weapons Systems Training Facility (NWSTF) Boardman that overlays northern Morrow County. Initially the Navy and Morrow County felt that appropriate land use strategies may be possible, but discussion with the parties has put that into question and it is not an alternative that is currently supported by all the involved parties. As you may be aware the impetus for this group and its work is the impediment to wind energy development caused by the Military Operations Area.

This group has also been working cooperatively discussing the proposed Boardman to Hemingway (B2H) transmission line and, because of the diverse background of the participants, wanted to find common ground on which to submit comment during this draft Environmental Impact Statement (EIS) comment period. The following were items that the group could come to agreement on:

- A southerly route is preferred. The current Horn Butte Alternative and its respective analysis is mostly adequate and would need to have additional analysis completed to a preferred terminus of the Slatt Substation.
- The Cumulative Impacts analysis does not adequately address two concerns - the multiple transmission lines that are proposed for the Bombing Range Road corridor or address the socioeconomic impacts of the B2H line on irrigated agricultural operations in north Morrow County. The Morrow County Chapter by Chapter review has more information on reasonably foreseeable future actions not currently identified that could further impact the Bombing Range Road corridor.
- The Longhorn Variant does not adequately distinguish the east side of the road from the west. The landowners are different and the activities are dissimilar. And the economics of the two actions cannot be compared, nor are they delineated. This dEIS is missing a crucial economic analysis of the agricultural operations under and adjacent to the proposed line.
- The dEIS does not address the potential for connected actions should the final route be some version of the Longhorn Variant. In order to accommodate wind energy generation and its associated transmission a number of actions may need to be taken to achieve a siting approval that would be consistent with the final EIS and any approval

After the Draft EIS was released for public review, Idaho Power changed its Proposed Action from the previously preferred northern terminus at Grassland Substation, or alternative Horn Butte Substation to a northern terminus at Longhorn Station stating that, in the absence of the Cascade Crossing transmission line, neither the Grassland or the Horn Butte Substation would provide the required approximate 1,000 megawatts of bi-directional capacity and up to 1,500 megawatts of actual power-flow capacity. Therefore, the proposed Grassland or Horn Butte substations and the alternative routes to these substations do not meet the objectives of the B2H Project. Refer to Final EIS Sections 2.1.1.1 and 2.5.4 for more explanation.

C6a Regarding consideration of the Slatt Substation, in a letter dated July 23, 2015, the Bonneville Power Administration, the sole owner of the Slatt Substation, informed the BLM that the Slatt Substation has no open 500-kV bays and there are "severe physical constraints" to expanding the substation to accommodate the B2H Project. Also, because the Slatt Substation is wholly owned by the BPA, the BPA's policy and rate schedules would require that BPA charge the Applicant and PacifiCorp for use of the substation (which would be passed onto the rate payers. In addition, a thorough study would have to be completed to determine whether the Slatt Substation could meet the B2H Project's objectives. Because the Slatt Substation is seriously constrained and technically infeasible, and does not meet the interests and objectives of the B2H Project and its partners, consideration of the Slatt Substation and an alternative route to the substation was eliminated from detailed analysis in the Final EIS (Final EIS Section 2.5.4).

The Final EIS has been revised to provide more detailed analysis related to cumulative effects. Counties and cooperating agencies were contacted and asked to provide additional information to be included in cumulative analysis for the Final EIS.

C6b A discussion of the potential for more transmission lines to use this corridor has been added to Types of Potential Effects in Sections 3.2.7 and 3.3.4. Also, the Applicant has proposed an additional action to construct a 230-kV transmission line along Bombing Range Road for the potential wind farms (including those you have mentioned) that may in the future need to tie in to the grid. This 230-kV discussed for each resource, including irrigated agriculture, under the Applicant's Proposed Action and is referred to as Additional Action – 69-Kilovolt Line Replacement Options 1, 2, and 3.

The economic analysis in Section 3.2.17 includes data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C6c See next page for response to C6c.

C6d See next page for response to C6d.

COMMENT(S)

RESPONSE(S)

C6

Morrow County Planning Department (cont.)

C6d

granted through the Energy Facility Siting Council. The final EIS should address these potential connected actions, including but not limited to relocation of current lines and development of transmission related to pending projects, associated with this routing variant.

The MAAC appreciates the work of the Bureau of Land Management and thanks you for this opportunity to provide comment. The group is committed to seeing this project be built, albeit built in a way that is supportive of the agricultural community and the opportunities that we have in development of renewable wind energy projects and the associated transmission lines for those projects.

Should you have any questions about this letter or the MAAC, please contact Morrow County Planning Director and staff to the MAAC, Carla McLane, at 541-922-4624 or by email at cmclane@co.morrow.or.us.

Cordially,



Leann Rea
Morrow County Commissioner

Don Rice
Greenwood Resources



Jerry Breazeale
Morrow County Planning Commissioner

Larry Lindsay
Lindsay Ranches

Steve Meyers
Umatilla Electric Cooperative

C6c

Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3, including those that distinguish the east side of the Bombing Range Road from the west side.

The economic analysis in Section 3.2.17 includes data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

C6d

This EIS does not specifically address requirements of the state EFSC process. The B2H Project is being permitted concurrently through the Oregon Department of Energy and EFSC. The BLM assumes the B2H Project will comply with land use ordinances and state preservation goals as dictated by the Oregon Department of Energy.

RESPONSE(S)

Owyhee Irrigaiton District

Boardman to Hemingway Transmission Line Project | P.O. Box 655, Vale, OR 97918

COMMENT(S)**RESPONSE(S)****C7****Owyhee Irrigation District (cont.)**

OWYHEE IRRIGATION DISTRICT
17 South 1st Street
Nyssa, OR 97913

January 29, 2015

Boardman to Hemmingway Transmission Line Project
P.O. Box 655
Vale, OR 97918

RE: Boardman to Hemmingway Transmission Line Project

Greetings:

I am the District Manager for the Owyhee Irrigation District. I am submitting these comments on behalf of Owyhee Irrigation District.

The proposed route near the Owyhee River creates potential problems with Bureau of Reclamation and Irrigation District facilities that the Malheur S Alternative does not. The topography of the land east of the Owyhee River where the proposed route is to cross the Owyhee River is highly unstable. The construction and location of the proposed power line in that area could cause catastrophic loss of the Kingman Lateral resulting in possible flooding and damage to the proposed power line itself. The lateral has slid off of the mountain in this area before. If the power line were to be constructed in this area, substantial mitigation, including the possible piping of the Kingman Lateral would be required. This area also includes an access road to the North Canal of the Owyhee Project and the Kingman Lateral. This is an area of high activity for personnel and heavy equipment. The placement of the power line in this area will put not only the heavy equipment and personnel at risk, but also the power line.

The Owyhee Irrigation District Board of Directors recommends that the Malheur S Alternative be designated the preferred route.

Very truly yours,



Jay Chamberlin,
District Manager

CC: Jerrold Gregg, USBR

C7a [Landslide potential and areas of instability were assessed

C7b [Analysis has been expanded to include alternative route variations with careful consideration of opportunities for colocation of utilities and potential for utility conflicts. See Section 3.2.6 for further detail.

COMMENT(S)**RESPONSE(S)****C8****Umatilla County, Oregon**comment@boardmanto hemingway.com

From: Melinda Slatt <melinda.slatt@umatillacounty.net>
Sent: Wednesday, March 18, 2015 2:47 PM
To: comment@boardmanto hemingway.com
Cc: George Murdock; Tamra Mabbott; Doug Olsen
Subject: B2H Comments
Attachments: Umatilla County B2HComment.pdf

To Whom It May Concern:

Attached are Umatilla County's comments regarding the B2H Project. I have also sent a hard copy of this information today by Fed Ex.

Please confirm receipt of this email. Thank you.

--

Melinda Slatt

Executive Secretary
Board of Commissioners
Umatilla County
216 SE 4th Street
Pendleton, OR 97801
Phone: 541-278-6204
Fax: 541-278-6372
Email: melinda.slatt@umatillacounty.net



RESPONSE(S)

Umatilla County, Oregon (cont.)

COMMENT(S)

RESPONSE(S)

C8

Umatilla County, Oregon (cont.)

ATTEST:
OFFICE OF COUNTY RECORDS


Records Officer



COMMENT(S)

RESPONSE(S)

C8

Umatilla County, Oregon (cont.)

Umatilla County

Board of County Commissioners



Commissioners

George L. Murdock
541-278-6202

March 18, 2015

W. Lawrence Givens
541-278-6203

William J. Elfering
541-278-6201

Boardman—Hemingway Project

Umatilla County Commissioner Statement

Introduction

The Umatilla County Board of Commissioners appreciates the opportunity to respond to questions regarding the Hemingway Project which has a significant footprint in the county. The project would extend fifty miles through the county and directly consume 1,564 acres of land. Due to the impact of the transmission line, many more acres of land would be impacted both directly and indirectly.

Lest there be no doubt where the county and the constituents represented in this report stand there are several major points which need to be addressed clearly at the outset:

- The majority of those testifying at our hearing on February 17 oppose the project and wish it would go away.
- There is no significant benefit to Umatilla County from this project.
- Residents would prefer the line take an alternative route and avoid Umatilla County.
- If the line does come through Umatilla County, it should primarily follow I-84 which is an existing corridor.
- Agriculture is the foundation of the economy in Umatilla County and valuable land must be preserved. We believe the DEIS sufficiently lacks adequate detail to accurately account for impacts to agriculture and the cumulative impacts to the natural, human and cultural environment as required by NEPA.

Basis For Response

In advance of preparing this response, we have attended public presentations and we scheduled a work session with those farmers, ranchers, and property owners in Umatilla County most-impacted by this project. That work session was held February 17, 2015 at the Umatilla County Courthouse in Pendleton. In addition, we have made site visits to some of the areas most negatively impacted by the presence of this line.

216 S.E. 4th Street • Pendleton, OR 97801 • Ph: 541-278-6204 • Fax: 541-278-6372

C8a

C8b

C8c

C8a [Comment noted.

C8b

[Comment noted. Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

C8c

[The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Sections 3.2.7 and 3.3.3.7.

COMMENT(S)

RESPONSE(S)

C8

Umatilla County, Oregon (cont.)

Umatilla County
Commissioners Statement
March 18, 2015
Page 2

C8d

Discussions of the proposed project are nothing new in the county. In the minutes of the Umatilla County Planning Commission dated November 6, 2008, Land Use Planning Director Tamra Mabbott commented *"There is no real net benefit to Umatilla County to have the line run through. The Planning Commission wants to consolidate lines not add more. At the same meeting, Planning Commission Member Gary Rhinhart said "he would prefer the line follow Interstate 84." Again, at the same meeting, Commission Member Frank Kaminski asked the same question, "Why doesn't the proposed line follow I-84." At the hearing on February 17, Planning Commission Member Suni Danforth again pointed out the need to honor the integrity of existing corridors rather than creating new ones.*

Also on February 17, Rhinhart and others reaffirmed their belief the line should follow the corridor which currently exists along I-84. The Board of Commissioners agrees that if the project needs to move forward, every effort should be made to follow the route along I-84.

Speaking to the Planning Commission at a meeting on August 26, 2010, Kristi Perdue, facility siting coordinator for Idaho Power stated *"the line will cross public and private lands in multiple counties in Idaho and Oregon and will follow existing energy and transportation corridors as much as possible."*

She also reminded the Commission *"the proposed corridor shown is a 4000 foot wide study corridor, which allows Idaho Power to work with landowners to adjust the line. When final, it will be reduced to a centerline route, which will require 250 feet of right-of-way. The 4000 foot study corridor allows the flexibility to move the line if necessary."*

C8e

Comments from members of the Planning Commission are based upon the idea that following Interstate 84 presents the least impact on the environment, the least impact on wildlife, and the least impact on valuable farm and ranch land.

In summary, we do not believe that the routes provided by qualified individuals during multiple work sessions and through the recommendations of professional planning staff were adequately studied as required by the National Environmental Policy Act of 1969, which states specifically that federal agencies shall, "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources...."

Opposition To Proposal

C8f

C8g

Strong opposition to the proposal was offered by Homer Peterson, a wheat rancher and cattleman who farms south of Pendleton. He stated he is strongly opposed and hopes the project will go elsewhere. Wheat Rancher Richard Hemphill of Pilot Rock echoed those sentiments as did others. Isabel Chapman, a student at Pendleton High School told the audience farmland is precious and needs to be protected.

C8d

Comment noted. See response to Comment C8b.

C8e

Comment and route preference noted.

C8f

Comment noted. See response to Comment C8b.

C8g

Comment noted.

COMMENT(S)

RESPONSE(S)

C8

Umatilla County, Oregon (cont.)

Umatilla County
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Page 3

C8h

Brandon Christensen, a young farmer from south of Echo, said he will have to live his life farming under or around the power line. He was joined in his opposition by John Luciani, a Morrow County farmer. Both Christensen and Luciani farm about 5,000 acres. Steve Platt, a cattle rancher, also stated his concerns about the fact the line will have a permanent impact on his farming and ranching operations, as did Tim Hawkins, who also farms a significant amount of land impacted by the power line.

Micro-Siting

Should the proponents of this project choose to ignore those factors, then a second discussion surrounds compromises that could be made near the proposed route in order to minimize the negative impact on Umatilla County land owners. This impact involves the environment, quality of life considerations, potentially severe economic consequences, and other factors of fundamental general consideration in light of the proposed presence of a 500 MV power line complete with large towers.

C8i

The project passes through rugged mountain terrain as well as some of the richest and most valuable farmland in the State of Oregon. In some cases, the current proposal includes severe impact on high value farming practices that include circle irrigation. In some cases, a modest level of micro-siting could mitigate the damage. Rancher Larry Hoeft also spoke about the impact on wheel lines when the power line bisects fields utilizing irrigations circles or even, in some cases, wheel lines.

C8j

One of the most compelling arguments came from Shana Bailey who owns a ranch on McKay Creek in one of the most remote areas in Umatilla County. The proposed line of the project goes over her home as well as an expensive horse corral from which they make their living training horses. A number of audience members pointed out the impact of the power line on animals both at the Bailey Ranch as well as in other areas which would be impacted by the line.

C8k

Many of those testifying at the hearing on February 17, expressed concern not just about the 250-feet of right-of-way, which encompasses 1,564 acres of property in Umatilla County, but also about the damage to farming practices on either side of the right-of-way. These concerns include aerial spraying, wheel lines for irrigation, irrigation circles, potential impact on livestock, and similar factors. Brandon Christensen, who farms near Butter Creek, pointed out the fact aerial spraying is impacted not just on the right-of-way but for a thousand feet on either side.

C8l

While micro-siting remains a possibility, Pendleton Attorney Steve Corey, speaking on behalf of the Cunningham Sheep Company and Pendleton Ranches, stated their concerns have been repeatedly ignored despite participating widely in sessions related to the project. The lack of response to citizen input was a constant among those testifying.

C8h

The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7

C8i

The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7. Mitigation measures and design features are disclosed in Tables 2-7 and 2-13 and are discussed in Section 3.2.7 as they pertain to agriculture.

C8j

Analysis has been expanded to include alternative route variations with careful consideration of private lands. The impact on property rights will be carefully considered by Applicant (Applicant), during micro-siting. The Applicant will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.

C8k

The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7, which includes a discussion of aerial spraying.

C8l

BLM has provided opportunities for public participation (please refer to Section 4.3).

COMMENT(S)

RESPONSE(S)

C8	Umatilla County, Oregon (cont.)	
	<p>Umatilla County Commissioners Statement March 18, 2015 Page 4</p>	
C8m	<p>One of the major concerns of the farmers and ranchers is what source of severance damages will be paid to landowners, not just based upon the basic right-of-way, but with regard to the loss of ability to use the remaining land productively and economically as the historical pattern of farming changes due to this intrusion, a point made strongly by Corey and echoed by Allen Insko, who represents several generations of farmers and who has several miles of rangeland which would be impacted.</p>	C8m
C8n	<p>Many of the landowners have taken the position that while they would rather the project not take place, they are facing reality and primarily seeking solutions that provide the least damage to their livelihoods and way of life and which mitigate damages not just caused by the 250-foot right-of-way but by the overall impact the project has on their operation. This impact would have to be determined on an individual basis since circumstances would likely vary from one property to another.</p>	C8n
C8o	<p>Another concern involving micro-siting is conflict it could create between neighbors since satisfying one landowner might well negatively impact another. This was another point made by Attorney Steve Corey and echoed by Larry Hoeft, a rancher, as well as several other speakers.</p>	C8o
C8p	<p>For this reason, we ask the sponsors to provide specifics regarding micro-siting considerations that satisfactorily address those concerns and meet the pragmatic agreement of those most impacted. J. R. Cook, executive director of NOWA, indicated that route maps lack sufficient detail to provide quality responses to many questions.</p>	C8p
	<p><u>Strange Bedfellows</u></p>	
C8q	<p>Concerns about the Hemingway Project have created unusual bedfellows and have placed Umatilla County as well as farmer and ranchers in conflict with federal agencies that normally insist on minimizing any impact on the environment. Instead, they have created solutions which create a severe impact on private lands in an effort to avoid complicated negotiations that could potentially lead to a mitigation of environmental damage.</p>	C8q
	<p>As Gary Rhinart, the former chair of the Umatilla County Planning Commission reported, Oregon has historically been a leader in protecting its farm and forest land from encroachment. He also said he believes protecting natural resources is more important than cutting costs.</p>	
C8r	<p>Katherine Palmer, whose family owns land near the project, said a major problem is the fact those living in metropolitan areas overlook ways to conserve electricity which translates into the use of more and more valuable farmland for power generation and transmission purposes.</p>	C8r
C8s	<p>Farmers, ranchers, and property owners, many of whom have roots going back many generations, have a strong commitment to preserving for both current and future generations those areas of pristine wilderness as well as areas of rich farmland that can never be replaced. The Hemingway</p>	C8s
		<p>Input from the landowner and the impact on property will be carefully considered by Idaho Power during final design and engineering, which could include micro-siting of the transmission line along the selected route. Idaho Power will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated.</p>
		<p>Comment noted.</p>
		<p>Comment noted.</p>
		<p>The impact on property rights will be carefully considered by Applicant (Applicant), during micro-siting. The Applicant will negotiate with the owners of real property interests to ensure that, if any private property interests are impaired by the final location, they are appropriately compensated. In addition the counties and cooperating agencies provided information regarding reasonably foreseeable projects within the B2H Project for inclusion in Cumulative Impacts analysis.</p>
		<p>Comment noted.</p>
		<p>Comment noted.</p>
		<p>Comment noted.</p>

COMMENT(S)

RESPONSE(S)

C8	Umatilla County, Oregon (cont.)	
	<p>Umatilla County Commissioners Statement March 18, 2015 Page 5</p>	
C8s	<p>Project, as designed, will permanently scar the land and destroy natural resources this state has historically sought to preserve. In short, as proposed, this project is a contradiction to a wide array of environmental traditions.</p>	
	<p>Other Concerns</p>	
C8t	<p>Utilizing maps provided by the Hemingway Project, visitations were made to several of the roads that would have to be used as access points for a massive construction project estimated to demand 450 workers. Umatilla County, as noted by Public Works Director Tom Fellows, is concerned about the potential damage to rarely-used county roads which were built and are maintained only for very limited travel. Therefore, use as part of a major construction project, could provide severe damage to those roads and place an undue burden on the Umatilla County Public Works Department.</p>	<p>C8t Reclamation of temporary access roads is outlined in the Applicant's Plan of Development (to be finalized prior to the Record of Decision) and associated Traffic and Transportation Management Plan. These documents state that reclamation of any road used for project construction, operation, maintenance and decommissioning would be restored to re-project conditions.</p>
C8u	<p>Consistency with Comprehensive Plan</p>	
C8u	<p>Given the specific testimony from the farmers and ranchers, the Board of Commissioner finds that the proposed alignments are not consistent with our Comprehensive Plan. Specifically, the alignments are contrary to the following sections.</p>	<p>C8u Analysis has been expanded to include alternative route variations with careful consideration of county lands and planning guidance. The Final EIS has been updated to expand the discussion of compliance with existing land use plans and identify any areas where there is a conflict between the B2H Project and existing planning guidance. See Section 3.2.6 for further detail.</p>
	<p><i>Chapter 18 The Plan Map, Agricultural Lands, page 18-2.</i></p>	
C8v	<p>"It is further necessary to preserve and protect the maximum amount of prime agricultural land resource as is possible to help assure future commercial agricultural production. In areas having special or unique agricultural resource circumstances, the intent is to maintain and protect existing agricultural production and to continue encouragement of the intensive management practices occurring on a diversity of parcel sizes. The preservation of agricultural land has the secondary benefit of conserving the natural resources that are an asset to the physical, social and economic quality of life in Umatilla County."</p>	<p>C8v The analysis of impacts on agriculture for all alternatives in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.</p>
	<p><i>Chapter 14 Public Facilities and Services</i></p>	
C8w	<p>Finding 19. Utility facilities can remove valuable resource lands and create development problems for new developments and detract from existing development.</p> <p>Policy 19. Where feasible, all utility lines and facilities shall be located on or adjacent to existing public or private rights-of-way so as to avoid dividing existing farm or forest units; and transmission lines should be located within existing corridors as much as possible.</p>	<p>C8w Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/ options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2.</p>

COMMENT(S)

RESPONSE(S)

C8

Umatilla County, Oregon (cont.)

Umatilla County
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Page 6

Alternatives and Cumulative Impacts

The BLM, as the agency responsible for the EIS, is required to establish that it has considered all reasonable alternative alignments of the B2H Project in order to support an informed decision. Respectfully, the DEIS fails: it does not correctly apply the law and is not supported by substantial evidence. Importantly, the DEIS fails to adequately evaluate the B2H Project's effects upon irrigated agriculture and the communities that rely upon the economic engine of high value irrigated agricultural operations. What little analysis the DEIS includes in this regard, is largely erroneous, inconsistent and incomplete. The DEIS represents an inadequate qualitative, and factually incorrect quantitative, analysis of taking irrigation land out of production and thus fails to evaluate the significant economic and social consequences of the alternatives evaluated. Moreover, the DEIS fails to consider reasonable alternatives that have previously been presented to BLM and IPC. Water and the irrigated land that depend on it are precious and scarce. With limited surface and groundwater availability, new or expanded water rights are difficult and, in some instances, impossible to obtain. Correspondingly then, little if any new irrigated farmland can be developed to replace what is taken by energy projects. If additional irrigated land can be developed, it will be located in the corners of existing irrigated circles where improved irrigation techniques and water storage programs make it possible to extend irrigation systems to maximize agricultural production. Placement of proposed B2H towers in circle corners is improperly viewed in the DEIS as mitigation, but in reality it is a serious adverse impact that is inadequately considered. Placing towers in circle pivot corners prevents farmers from employing the valuable opportunity to efficiently and affordably develop new irrigated cropland. These losses in turn increase the scarcity and cost of high value irrigated farmland. These are significant economic and social consequences that have not been adequately evaluated in the DEIS.

Moreover, the Preferred Alternative fails to evaluate the cumulative impacts of the proposal, as required. Building a new substation for the B2H Project, creates an irresistible invitation for other energy facility projects to build ever more transmission lines to connect with new projects and projects currently on the books. Therefore, the Preferred Alternative guarantees other serious, deleterious impacts on irrigated agriculture that have not been evaluated as required by law.

Conclusion

Based upon an examination of the project and extensive input received from a variety of sources and incorporated in this response, the Board of Commissioners, representing the citizens of Umatilla County, would prefer the project go elsewhere in light of the fact the project provides no substantial benefit to the County.

Based on comments received by the BLM on the Draft EIS, collaboration with the counties and their constituents occurred, resulting in a number of recommended routing variations/ options, which were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.

Comments noted. The analysis of impacts on agriculture for alternative routes analyzed in detail in the Final EIS includes a quantitative analysis of important farmland, high-value soils, irrigated farmland, and existing agriculture. Refer to Section 3.2.7.

The economic analysis in Section 3.2.17 includes data on effects to irrigated farmland from the construction and operation of the B2H Project. The analyses assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

Idaho Power has indicated that most pivots can be used under the transmission line in the right-of-way. The transmission line structures would be located outside of pivots, and their locations would be selected in coordination with the landowner so as to minimize impacts on operations and irrigated farmland. Where structures cannot be located outside of pivots, landowners would be appropriately compensated. See Section 3.2.7.6 for further discussion of impacts to prime farmland, pivot irrigation, and irrigated agriculture.

The economic analysis in Section 3.2.17 has been updated with additional data on effects to irrigated farmland from the construction and operation of the B2H Project. The revised analysis assess how surface disturbances may affect crop yields under the alternatives, and how these changes in crop yields may affect local economic conditions.

The cumulative effects analysis presented in the Final EIS includes reasonably foreseeable future actions.

Comment and route preference noted.

COMMENT(S)**RESPONSE(S)****C8****Umatilla County, Oregon (cont.)**

Umatilla County
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Page 7

C8ab [

Short of that possibility, the Board of Commissioners support the recommendation of the Umatilla County Planning Commission which has encouraged use of the I-84 corridor for reasons outlined throughout this position statement.

In addition, the Board of Commissioners encourages the Bureau of Land Management and Idaho Power to give careful consideration to the concerns outlined throughout this document.

Respectfully Submitted



George Murdock, Chair
Umatilla County Board of Commissioners

GM/ms

C8ab [Comment noted. See also response to Comment C8d.

ATTACHMENT

Umatilla County, Oregon (cont.)



ATTACHMENT

C8

Umatilla County, Oregon (cont.)

Larry Hoeft
68060 Hwy 395 South
Pendleton, OR 97801
541-443-6561

In regards to the Hoeft property.

We do not want a tower in our field and have been told by people associated with Idaho Power that this Property can be spanned. If the Columbia River can be spanned, surely you can span this property.

With this transmission line going in, our quality of life will be affected by; obstructing our view of the mountains, interfering with our farming and ranching operations, and any future developments.

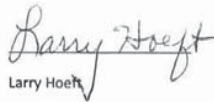
If Idaho Power is cooperative and spans our property we will also be cooperative in kind, but before we agree we would require Idaho Power and those who are associated with this project or whoever is in charge to supply us with a letter that is signed, notarized, and recorded to the fact that the field will be spanned.

Thank you,



LaVelle Hoeft

10-7-11



Larry Hoeft

ATTACHMENT

C8

Umatilla County, Oregon (cont.)

Shana Bailey
49603 McKay Creek Road
Pilot Rock, OR 97868

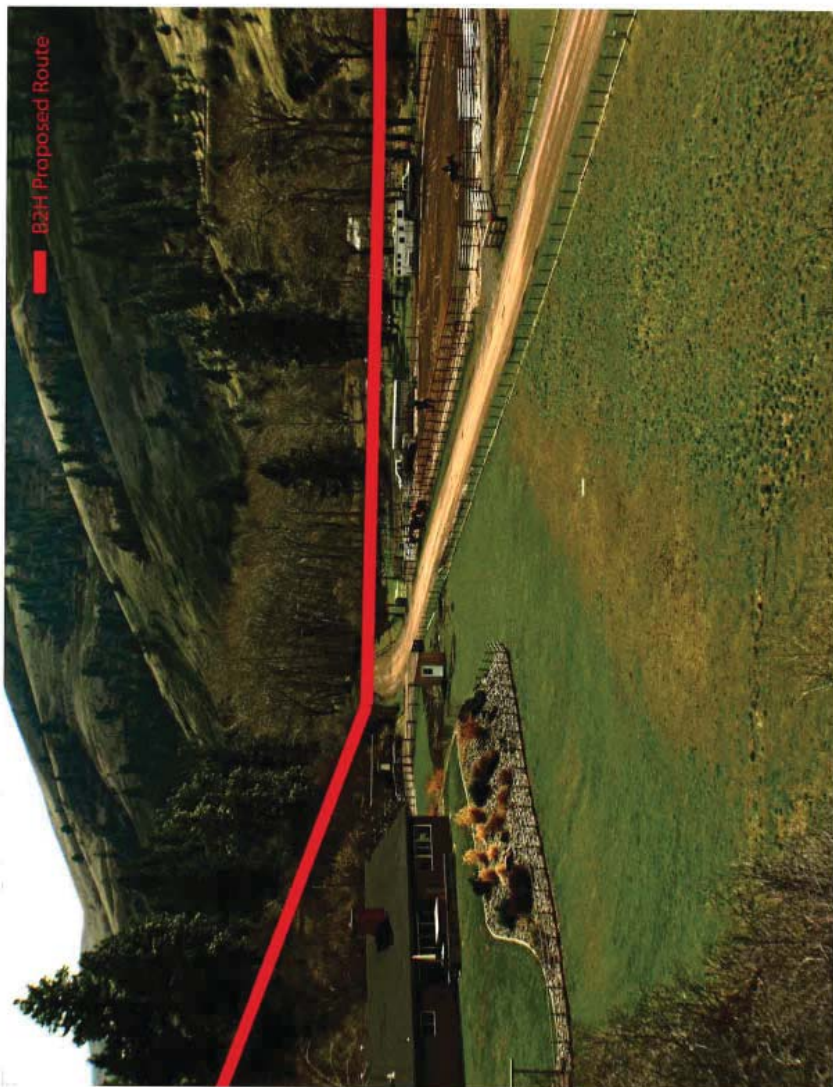
Ms. Bailey submitted two photographs (copies attached) of her property to the Umatilla County Board of Commissioners at the February 17, 2015 meeting with the landowners regarding the B2H Transmission Line Project.

George
Mudock

ATTACHMENT

C8

Umatilla County, Oregon (cont.)

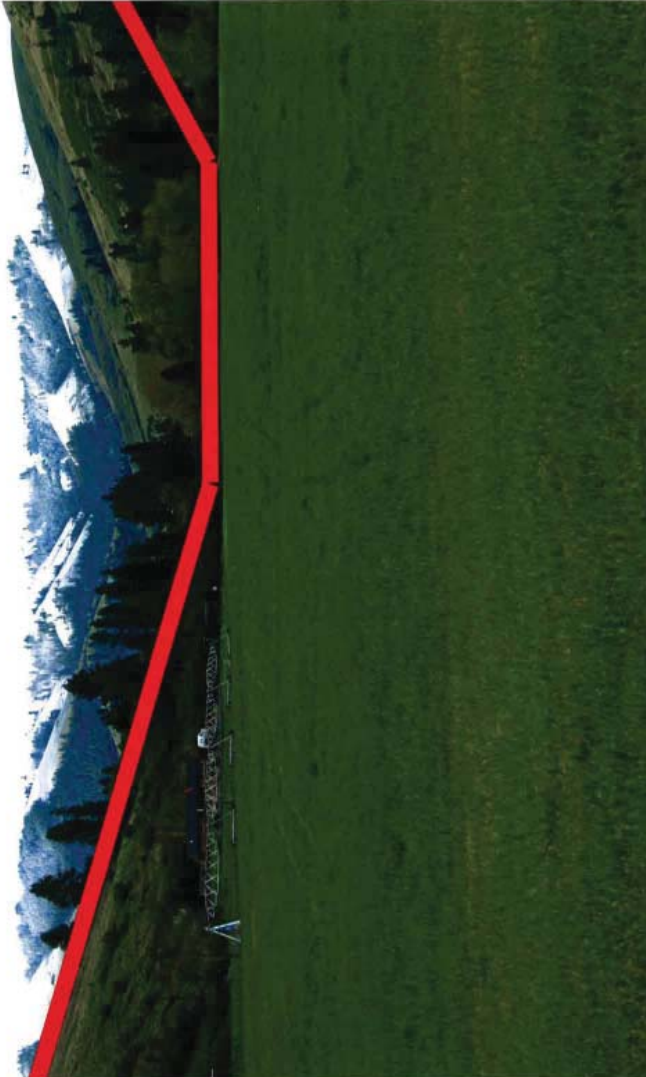


ATTACHMENT

C8

Umatilla County, Oregon (cont.)

■ B2H Proposed Route



COMMENT(S)



RESPONSE(S)

C9

Union County, Oregon

B2H Transmission Line Project
Boardman to Hemingway

COMMENT FORM

Date: 3-10-15

First Name: Scott Last Name: Hartell

Organization or Affiliation (if any): Union County

Address: 1001 4th St. Suite C

City: La Grande State: OR Zip: 97850

E-mail address: shartell@union-county.org Phone: (541) 963-1014

Privacy Statement: Before including your address, phone number, e-mail address or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold identifying information, we cannot guarantee that we will be able to do so.

☐ Please check here if you wish your personal information to remain confidential.

Comments must be submitted by March 19, 2015.

My comments on the Boardman to Hemingway Transmission Line Project are:

See attached letter.

Boardman to Hemingway Transmission Line Project | P.O. Box 655, Vale, OR 97918

COMMENT(S)**RESPONSE(S)****C9****Union County, Oregon (cont.)**
**UNION COUNTY
BOARD OF COMMISSIONERS**

Steve McClure, Commissioner
Mark D. Davidson, Commissioner
Jack Howard, Commissioner

1106 K Avenue La Grande, OR 97850 PHONE (541)963-1001 FAX (541)963-1079 TTY 1-800-735-1232

March 10, 2015

Bureau of Land Management
Tamara Gertsch
National Project Manager

Dear Mrs. Gertsch:

Union County has provided direction to the B2H Transmission Line Project reviewing entities to place the new proposed 500kV line near the existing Idaho Powder 250kV corridor through Union County to the extent possible. Since the proposed 500kV line (B2H) does not require interconnection with existing substations in the City of La Grande, we have also requested the proposed B2H route stay outside of the view shed of the City of La Grande.

Currently, we believe the identified "proposed" and "alternative" routes in the Draft Environmental Impact Statement satisfy our direction. However, since this is a draft document and substantive comments from effected land owners in Union County could possibly change a route, we respectfully request continued participation as a Cooperating Agency in the review process dealing with any changes leading to a final decision.

Sincerely,


Mark Davidson
Commission Chair

C9a

C9a

Based on comments received by the BLM on the Draft EIS, collaboration with the counties, and on further discussion between the Applicant and landowners, a number of recommended routing options were incorporated into the network of alternative routes analyzed for the Final EIS. Refer to Sections 2.1.1.3 and 2.5.2. Analysis of the alternative routes is reported throughout Chapter 3.